

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DR. DEREK MELBY, and DANILO §
POLICARPIO as individuals and on behalf of §
all others similarly situated §

Plaintiffs,

V.

AMERICA'S MHT, INC., SCOTT POSTLE,
ASCENTIUM CAPITAL, LLC, and
CLIFF MCKENZIE

Defendants.

Civil Action No. 3:17-CV-155-M

consolidated with

Civil Action Nos. 3:17-CV-732-M;
3:17-CV-868-M; and 3:17-CV-963-M

**APPENDIX TO PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEY'S FEES
AND EXPENSES AND MEMORANDUM OF LAW IN SUPPORT**

Pursuant to Local Rule 7.1, Plaintiffs file this Appendix to their Motion for Attorney's Fees and Expenses and Memorandum of Law in Support:

| EXHIBIT | DESCRIPTION | APP. NO. |
|----------|---|---------------|
| Ex. 1 | Declaration of Donald C. Massey in support of motion for (1) final approval of settlement; and (2) approval of class counsel's motion for an award of attorney's fees and reimbursement of expenses | App No. 1-37 |
| Ex. DM-1 | MHT Settlement Opinion from Courcelle Consulting | App No. 38-40 |
| Ex. DM-2 | February 6, 2018 letter from counsel for Ascentium Capital, LLC regarding non-issuance of Forms 1099 to doctors | App No. 41-42 |
| Ex. DM-3 | February 6, 2018 letter from counsel for Univest Capital, Inc. regarding non-issuance of Forms 1099 to doctors | App No. 43-44 |
| Ex. DM-4 | Billing and cost reports of Smith Haughey Rice & Roegge and counsel Kirk Morgan | App No. 45-65 |

| | | |
|----------|--|------------------|
| Ex. 2 | Declaration of Robert E. Couhig, Jr. | App. No. 66-70 |
| Ex. RC-A | Billing and expense report of Couhig Partners, LLC | App. No. 71-154 |
| Ex. 3 | Declaration of Leon Carter | App. No. 155-158 |
| Ex. LC-A | Carter Scholer identification and background information | App. No. 159-168 |
| Ex. LC-B | Billing and expense report of Carter Scholer | App. No. 169-179 |

Date: March, 2018

Respectfully submitted,

/s/ Jonathan P. Lemann

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on March __, 2018, a true and correct copy of the foregoing Appendix was served on all counsel of record through the Court's electronic filing system.

/s/ Jonathan P. Lemann

Jonathan P. Lemann

Exhibit 1

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**DECLARATION OF DONALD C. MASSEY
IN SUPPORT OF MOTION FOR (1) FINAL APPROVAL OF SETTLEMENT;
AND (2) APPROVAL OF CLASS COUNSEL’S MOTION FOR AN AWARD OF
ATTORNEY’S FEES AND REIMBURSEMENT OF EXPENSES**

I, Donald C. Massey, hereby declare:

1. I am a lawyer with the firm, Couhig Partners, LLC, one of the firms acting as Class Counsel in this litigation. I have personal knowledge of the matters set forth in this declaration and, if called to testify, could and would competently testify about them. I submit this declaration in support of Plaintiffs' motion, under Federal Rule of Civil Procedure 23(e), for (a) final approval of the class action partial settlement; and (b) Class Counsel's application for attorney's fees and reimbursement of expenses.

I. INTRODUCTION

2. This class action has been brought by committed, experienced, and skilled plaintiffs' counsel and has conferred benefits upon class members as envisioned by Federal Rule of Civil Procedure 23. Plaintiffs' counsel vigorously prosecuted this case in the best interests of the Class. Defendants asserted their legal and factual defenses and expressed their belief that named Plaintiffs could not prevail in this matter through several challenges and pleadings.

3. The settlement was reached only after Class Counsel: (a) conducted an independent and extensive factual investigation; (b) reviewed and analyzed publicly-filed financial statements; (c) reviewed and analyzed voluminous media files concerning America's Medical Home Team ("MHT"), and the "Lender Defendants" (Ascentium Capital, LLC, Univest Capital, Inc. and Balboa Capital Corp.¹) including any available public statements issued by or materials pertaining to the companies; (d) thoroughly researched the law pertinent to the claims and potential defenses asserted; (e) filed five detailed and comprehensive Complaints; (f) defended against a motion to dismiss the Complaint; (g) established an extensive factual record in this matter through a motion for injunctive relief, which mounted considerable pressure on MHT and which the undersigned believe was instrumental in its abandonment of its Ponzi scheme; (i) reviewed and analyzed all of the documents received from third parties; (h) interviewed and obtained extensive factual information from multiple former MHT employees, contractors and others; (j) consulted with experts to conduct the most favorable deal and understand its impact (k) attended MHT Bankruptcy creditors' meeting in the MHT Bankruptcy proceeding and cross-examined MHT CEO Scott Postle; (l) participated in a lengthy mediation session with a skilled Dallas-based mediator; (m) continued negotiations with counsel for Settling Defendants for more than a month;

¹ Hereafter, "Ascentium," "Univest," and "Balboa."

and (n) successfully negotiated, at arm's length, a highly favorable partial settlement for the Class; (o) continuously engaged in numerous discussions with class members as well as counsel retained by several class members privately and outside of class actions, to explain status, settlement discussions and proposed settlement.

4. As detailed below, this case was extensively litigated. The parties participated in a mediation before well-regarded Dallas-based mediator Christopher Nolland, and then engaged in follow-up calls, conferences and meetings. Despite diametrically opposed views on the merits, the parties were able to ultimately arrive at a settlement of the litigation for certain non-monetary injunctive relief and the release of alleged guaranty obligations which the Defendants value at approximately \$52 Million. In exchange, Ascentium and Univest would receive a return of approximately \$15 Million in settlement payments. Subsequently, the parties negotiated the remaining terms of the settlement, including other favorable aspects such as an early payment discount, extended payment terms rather than an immediate cash payment, prohibition on negative credit reporting by Settling Defendants against class members for actions or inactions up to the time of the settlement, and a cash payment to class members subject to claims as guarantors for Balboa Capital loans. The settlement terms were documented in the Stipulation of Settlement dated September 26, 2017 (the "Stipulation") and which the Court preliminarily approved. Notably, and as detailed below, the issue of attorney's fees was not addressed or negotiated until after the principal terms of the settlement were agreed among the parties.

5. Although the partial settlement of this case was within a year of filing the initial complaint, it is the product of time-consuming, intensive investigation and analysis, aggressive litigation, and sophisticated negotiations. It was negotiated on both sides by experienced counsel with a firm understanding of the strengths and weaknesses of their clients' respective claims and

defenses. The settlement confers an immediate and substantial benefit on the Class and eliminates the risk of continued litigation, the outcome of which could not be assured.

6. While the settlement does not end the entirety of the action, it does conclude a major portion of it. Balboa upon information and belief has IPA guarantees at issue that it values at more than \$5 million. The bankruptcy of MHT also complicates the ability to resolve the remaining portion of this case.

7. On November 22, 2017, the Court preliminarily approved the settlement (the “Preliminary Approval Order”) and established a schedule for final approval. Notice of the settlement terms was sent to more than 280 individual and institutional Class Members. Pursuant to the Preliminary Approval Order, the deadline for objecting to any aspect of the settlement or Plaintiffs’ counsels’ application for attorney’s fees was February 26, 2018. R.Doc. 64. To date, only ten distinct objections on behalf of fourteen objectors to the settlement have been filed as required by the Court’s Order. Additionally, 78 individual or corporate entities have filed timely opt out requests. R.Doc. 90. We respectfully submit that the low number of objections and opt outs is strong validation of the reasonableness of the settlement and Class Counsels’ attorney’s fee and expense application. The number of exclusions overall exceeds the threshold such that Ascentium has the option to terminate the proposed Stipulation. Even so, we respectfully submit that the number of opt outs is both low and given the nature of the settlement it remains highly advantageous to the class members. Similarly, Class Counsel’s attorney fee and expense application proposes attorney’s fees that are sensible fair and well in proportion to Class Counsel’s services and a small percentage of the value that the settlement brings to the class.

8. Ascentium has agreed to not exercise its termination rights under paragraph 57(C) of the Stipulation for excessive opt outs.

9. Finally, this declaration is submitted in support of the application by Class Counsel for an award of attorney's fees and reimbursement of expenses, plus interest. Class Counsel devoted several thousand hours to the prosecution of this litigation. Class Counsel expects to present support at the Fairness Hearing for a total Lodestar based fee award of \$2,300,000, (which will be inclusive of all Class Counsel fees and expenses, requested incentive awards, and the fees and expenses of two other firms providing common benefit services discussed below). While the Stipulation provides for a fee submittal in the range of \$2,000,000 to \$4,500,000, Class Counsel has agreed to seek an award of \$2,300,000, subject to Court approval, and Ascentium has agreed to not object to such an amount or argue for a lesser amount.

10. Class Counsels' representation is on a contingent basis. Counsel committed substantial amounts of resources to the litigation, working long hours, notwithstanding the significant uncertainty as to whether the litigation would succeed. Counsels' efforts have now produced a remarkably good and expeditious result for the Class. The fee requested is within the range of fees awarded by this Court as well as district courts within the Fifth Circuit and federal courts across the country.

11. The following paragraphs discuss in greater detail the nature of the claims asserted, the principal proceedings to date and the legal services provided by Class Counsel, the settlement negotiations, the terms of the settlement, why the settlement is fair and in the best interest of the Class, and the reasonableness of Class Counsels' attorney's fee and expense request.

II. HISTORY OF THE ACTION

A. Summary of Named Plaintiffs' Claims

12. This is a class action brought on behalf of all persons who are currently listed in Ascentium's, Univest's, Balboa's, and/or MHT's books and records as a Guarantor and/or as an

owner of a Doctor LLC. The Class members have and continue to vigorously deny any accountability, responsibility of control for or over the “Doctor LLCs.” Settling Defendants claims and class members agreement to settle are premised on the equivalent of the settlement payment of a guaranty claim on a single IPA.²

13. The class action claims arise from a scheme run by MHT to induce physicians to participate in a program in which they would purportedly earn vast profits for supervising nurse practitioners rendering in-home health care services to patients.

14. MHT sold licenses and equipment to the physicians, through LLCs that MHT created for them (“Doctor LLCs”). The licenses and equipment were financed by Ascentium, Univest, or Balboa with personal guaranties from the individual physicians. Plaintiffs have maintained that the whole process was fraught with misrepresentations and the program only sustained itself by inducing new physicians to join the program.

15. Plaintiffs have contended that the physicians were duped through a fraudulent enterprise in which each physician’s alleged “Doctor LLC” unknowingly bought typically \$300,000-worth of (a) “licenses” to start an MHT medical practice that never became profitable (and usually not even operational), and (b) “software” that was generic and never put to use. The Lenders funded the purchases, and, in return, received an installment payment plan calling for personally-guaranteed payments, typically totaling \$458,136 over the course of five-and-a-half years, in return for their \$300,000 expenditure.

16. Plaintiffs have contended that each “purchase” has been the product of fraud. MHT’s salespeople represented that (a) start-up costs (sometimes referred as a line of credit) were offered by Paul Allen’s Ascentium, (MHT’s financial partner), in the amount \$75,000 per practice;

² Note that the class members maintain that the IPAs were procured by the fraudulent acts and conduct of MHT and persons acting on its behalf.

(b) until the first “practice” was up and running these costs (or lines of credit as MHT and persons acting for it referenced the IPAs) would not extend beyond the \$75,000; (c) no physician would ever have to make payments on these loans or any line of credit; (d) a license could be returned at any time through a “novation” in which it is resold to another willing participant; (e) MHT handled everything other than supervising the medical treatment; (f) proprietary software was included due to Centers for Medicare and Medicaid Services (“CMS”) requirements; and (g) there would be *no* fees or interest associated with the acquisition of the license.

17. None of these representations were true, and each Plaintiff contended that he or she would not have participated in the MHT program had the Defendants not misrepresented the facts.

B. Procedural Background

18. On January 17, 2017, Derek Melby and Danilo Policarpio, individually and on behalf of all others similarly situated, commenced a class action in the United States District Court for the Northern District of Texas against MHT, Scott Postle, Ascentium, and Cliff McKenzie, which was docketed as Case No. 3:17-cv-00155.

19. On March 13, 2017, Vijay Kumar and Donnielle Green, individually and on behalf of all others similarly situated, commenced a class action in this Court against MHT, Scott Postle, Ascentium, and Cliff McKenzie, which was docketed as Case No. 3:17-cv-00732.

20. On March 28, 2017, Priti Bhagia, individually and on behalf of all others similarly situated, commenced a class action in this Court against MHT, Scott Postle, Univest, and Cliff McKenzie, which was docketed as Case No. 3:17-cv-00868.

21. On April 5, 2017, Jaideep Patel, individually and on behalf of all others similarly situated, commenced a class action in this Court against Scott Postle, Balboa, and Cliff McKenzie, which was docketed as Case No. 3:17-cv-00963.

22. On April 17, 2017, the Court entered an order consolidating the four cases under Case No. 3:17-cv-00155 and closing the other three cases. The Court further ordered Plaintiffs to file an amended complaint setting forth all their claims against all defendants in the consolidated action.

23. In compliance with the Court's order, Derek Melby, Danilo Policarpio, and Jaideep Patel filed a First Amended and Supplemental Class Action Complaint on September 18, 2017, setting forth claims against MHT, Scott Postle, Ascentium, Cliff McKenzie, Univest, and Balboa. The Plaintiffs again demanded trial by jury. The claims include violations of the Texas Deceptive Trade Practices Act, declaration of equitable estoppel, declaration of unenforceability of contracts, declaration of unconscionability, and RICO causes of action.

24. On November 22, 2017, the District Court entered an order preliminarily approving a class settlement between the plaintiffs and Ascentium, Univest, and Cliff McKenzie. R. Doc. 64. The Court conditionally certified a settlement class for settlement purposes only, conditionally appointed the plaintiffs, Derek Melby, Danilo Policarpio, and Jaideep Patel, as class representatives, and conditionally appointed Plaintiffs' counsel as Class Counsel. This conditional settlement does not include the Plaintiffs' claims against MHT, Scott Postle, or Balboa.

25. The Court set a hearing on the fairness, reasonableness, and adequacy of the proposed settlement for March 12, 2018. R. Doc. 64.

26. On December 27, 2017, Dr. David Guillot, individually and on behalf of all others similarly situated, filed a motion to intervene along with a complaint in intervention in which he sought to be added as a named class representative into as a representative of Subclass Three. R. Doc. 67.

27. On January 4, 2018, the District Court entered an order allowing Dr. Guillot to intervene in the action as a proposed class representative. R. Doc. 68.

C. Proceedings in U.S. Bankruptcy Court

28. On May 15, 2017, MHT filed a petition for relief under chapter 7 of the U.S. Bankruptcy Code.

29. On May 19, 2017, the District Court entered an order in the consolidated class actions that the automatic stay was in effect with respect to MHT.

30. On November 28, 2017, the Bankruptcy Court entered an order fixing February 26, 2018 as the deadline for filing proofs of claims by non-governmental creditors.

31. On February 26, 2018, Class Counsel has filed a proof of claim on behalf of the Class, attaching their Complaints from the consolidated class action. See *In re: America's MHT, Inc.*, No. 17-41047 (Bankr. E.D. Tex.) Claim No. 149 and R. Doc. 170.

D. The Class Action Litigation and Efforts of Class Counsel

32. Class Counsel became involved in the investigation of the MHT Ponzi Scheme in December of 2016, when a physician from Pittsburgh alerted them that a national scam was underway. Class Counsel spent the next several weeks reviewing contracts and related documents, reviewing online materials, locating potential fact witnesses and engaging in multiple discussions with physicians involved in the MHT program. Class Counsel spent many weeks analyzing the most appropriate litigation approach, venue, and procedure. Class Counsel continued discussions with multiple physicians both as potential clients, class members and witnesses, and began making contacts with what would soon turn into an important network of former MHT employees and consultants. Over the next several months, multiple individuals formerly associated with MHT cooperated with Class Counsel's investigations to assist in what both Class Counsel and the former

employees and contractors perceived as significant wrongs perpetrated on unwitting doctors. These contacts and the evidence obtained through them would drive this early partial settlement.

33. Plaintiffs' Complaint for a class action filed on January 17, 2017 apprised this Court of MHT's pyramid/Ponzi/fraudulent scam. The Complaint seeks a declaration that MHT's and Ascentium's guarantee agreements are null and void and seeks to enjoin MHT and Ascentium from enforcing their purported agreements with Plaintiffs and those similarly situated. The gravamen of the Complaint is that MHT and its principals promise unsuspecting physicians a lucrative side practice which captures an untapped market at no cost to them. The promises are misleading at best and are better described as outright lies as the practices offered were not sustained through operations. Rather, the practices were sustained only through further sales to yet more unsuspecting physicians.

34. After the filing of the Complaint, Class Counsel continued to develop facts, began conferring with a handful of other attorneys from across the country who represented physicians and physician LLCs in MHT related litigation, and offered to coordinate strategy with them.

35. In the midst of the continued investigation, Class Counsel learned that MHT employees were ordered to sign documents for physicians and cover up unsigned documents purporting to bind the physicians. Class Counsel learned that in December of 2016, key executives and consultants of MHT resigned or attempted to resign on the basis of knowledge that MHT was running on proceeds from membership sales and not Medicare or home-care revenue. Further, through their investigation, Class Counsel learned that in order to sustain itself, MHT continued to market itself and prey upon unsuspecting physicians. Several of these key officers made known their disagreement with MHT's continued operations and resigned as a result.

36. Further, Class Counsel learned that MHT secured a new “financial partner,” Balboa, around this late 2016 period and was preparing to engage in further marketing and sales of MHT program “licenses” and software, with this new source of financing. Class Counsel learned that MHT intended to favor repayment to this new financial partner, Balboa, from new sale proceeds to the detriment of Ascentium because physicians indebted to the new financial partner were “currently the better source of recruitment.” These ill practices would have expanded the fraudulent Ponzi scheme and prejudiced an unknown number of innocent doctors.

37. Class Counsel also discovered that MHT, in late 2016, proposed a new corporate structure to include “equity” opportunities to participating physicians and a model that stressed a need for recruitment of local colleagues. Class Counsel learned that MHT was unable to meet its payroll obligations for those nurses and staff that it hired to service the physician LLCs, and that it notified its participating physicians that the payroll failure stemmed from “money from sales to Balboa lending company” which had not been received that month.

38. As a result of these troubling developments, Class Counsel moved for a temporary restraining order and preliminary injunction to put an end to the scheme.

39. The motion, filed on February 16, 2017, included evidence that showed significant escalation of the Ponzi-like scheme and other troubling facts. R. Doc. 20. For example, in the past Scott Postle had siphoned off MHT funds for the personal purchase of substantial amounts of real estate for his personal benefit.

40. Class Counsel urged that the MHT operation should be enjoined before further havoc ensued, as plans were underway to ensnare more individuals. Class Counsel supplied declarations from three physicians establishing that Ascentium made recent personal demands on the Plaintiffs and threatened to report them to credit agencies. R. Doc. 20.

41. In connection with their February 2017 motion, Class Counsel pushed for a hearing at which they would seek to prove that MHT misrepresented to physicians that \$40 million committed from Ascentium was for operations. In reality this infusion was to finance additional license sales, the proceeds of which MHT used to pay down older IPAs from previous license sales. Class Counsel further asserted that Ascentium was granted ongoing access to the financial information of MHT and substantial details about the Doctor LLCs, and that Ascentium demanded a meeting in March of 2016 at which time it expressed considerable concern about the state of the Program and Ascentium's risk for millions of bad debts. Despite its expressed concerns, Ascentium continued funding MHT for license purchases and hooking physicians to IPAs.

42. Attached to its motion, Class Counsel presented a Declaration from Connie Ellwood, former executive assistant to Scott Postle, that Ascentium, at MHT's request, funded a significant number of loans for which there were no signed documents. Ellwood testified that MHT instructed Ellwood to ignore and mislead any physicians who requested a copy of his or her contract. Ellwood averred she was continually asked to lie to employees and physicians regarding their contracts and was instructed by Postle to not send physicians copies of these contracts.

43. Class Counsel worked diligently to uncover additional evidence to provide to the Court in an effort to prevent MHT from perpetuating the fraud and injuring other victims. Class Counsel uncovered and offered as support for its motion evidence that MHT's own officers and employees had offered dour prognostications of MHT's financial viability. For example, two consultants who were hired to assist MHT in a "turn around," Joseph West and Bradley Nurkin, found insurmountable problems with the MHT Program shortly after their engagement. Notably in a November 2016 memorandum ("West and Nurkin Memorandum") entitled "Immediate Concerns for Financial Operations of America's MHT, Inc." the authors observed, "We are very

concerned that the singular revenue stream of physician-credited licenses has not exceeded or even met expenses in any month during 2016.” West and Nurkin concluded:

It is our position that America’s MHT, Inc. cannot meet its financial obligations and most likely will not survive. With this understanding, we believe it is necessary to immediately halt the process of selling franchise licenses to physicians that will have credit obligations to support America’s MHT, Inc. We cannot support this process with the clear understanding we now have of the company’s financial problems, nor can we let it continue.

44. Through diligent and intensive investigation and efforts, Class Counsel discovered and presented evidence that despite the openness of the insolvency internally among MHT executives and consultants, MHT continued to approach class members and others with a reorganization plan, promising them equity and pleading with them to recruit other unsuspecting victims. This included an email from Scott Postle in December of 2016 discussing the past failure to fully indoctrinate participants in the “ultimate goal.” In that email, Postle stated:

As long as our doctors are only thinking of MHT as a local success or failure, then they will be missing the steps to their ultimate retirement We need to have all of our participating doctors immediately start referring local colleagues to build their MHT Physician Network and join the IPA so we can represent MHT as a national solution for payors and post-acute providers and suppliers Our doctors **must refer** their colleagues significantly in January and we will overcome our current financial situation. I have a conference call with Balboa Capital to prepare them for an increase in funding ...”

45. Evidence uncovered by Class counsel also included a December 29, 2016 email from Dr. Nhue Ho to Postle entitled “Balboa Capitol.” In it, Ho states, “I would prefer that we take care of Balboa money before Ascentium once we have some cash. The docs who are under Balboa are our current referral source.” Postle responded to Ho’s December 29, 2016 email, stating: “Absolutely. They want as much good press about MHT to pass along to their investor groups to keep the funds flowing as we grow to 1200 doctors, 4800 Care Teams and 3 Billion in revenues. They want to be our strategic financing partner to make it happen.” See R. Doc. 20.

46. Similarly, though their efforts, Class Counsel located and provided to the Court a December 29th and 30th email conversation between Postle and Dr. Ho concerning the significant payroll tax indebtedness facing the company in which Postle stated: “We have to set aside 10 doctor sales (@300K x 10) in January to bring our IRS and State withholding payments current to allow us to file buy [sic] January 30th That’s why we need a lot of our doctors engaged in referring their local networking doctors in early January We need to rev-up our physician sales team” *See* Exhibit 5-D, R.Doc. 20. Dr. Ho, perhaps somewhat less the optimist, offered in response: “I am not sure if we can reach that many licenses. That is 40 licenses for the IRS, another 10 to 12 licenses for payroll and another 10 to 12 for Ascentium and Balboa. That is 60 licenses. I think if we can get 30, we will be fortunate. I just do not see doctors referring a lot of their friends.”

47. Not surprisingly Defendants, and in particular Ascentium, staunchly fought the allegations presented and the relief requested by Class Counsel.

48. Ascentium responded to the motion for injunctive relief with citations of the applicable contract documents such as: “In exchange for Ascentium funding the plaintiff-doctors’ new businesses, the Doctor LLCs agreed to make their monthly payments to Ascentium regardless of any issue they may have with MHT:

‘Customer’s obligation to make the Payments to [Ascentium] ... SHALL BE ABSOLUTE, UNCONDITIONAL, NON-PREPAYABLE, AND SHALL NOT BE SUBJECT TO ANY ... REDUCTION OR DEFENSE FOR ANY REASON WHATSOEVER’ (emphasis in original);

‘Customer agrees that it will not assert against [Ascentium] any claim that it may have against [MHT], regardless of whether or not: (i) the Software performs or does not perform ... ; (ii) [MHT] ... has breached any of its obligations ... ; or (iii) the licenses granted pursuant to the Software Documents ... are unsatisfactory for any reason;’

‘In the event of any default by [MHT] under the Software Documents, Customer’s sole remedy, if any, shall be against [MHT];’ and

‘CUSTOMER ACKNOWLEDGES THAT [ASCENTIUM] DID NOT SELECT, OR CREATE THE SOFTWARE ... AND THAT [ASCENTIUM] IS NOT THE AGENT OF [MHT] NOR [MHT] AN AGENT OF [ASCENTIUM]’ (emphasis in original).” R.Doc. 27, p. 4.

49. Ascentium noted that in connection with funding the IPAs, various guarantor physicians were called by Ascentium and affirmatively acknowledged the IPAs, their guarantees of the IPAs, and that they knew that as a guarantor, he or she would be responsible for the loans should the LLCs created by MHT not succeed in the business venture. Ascentium pointed out to the Court that the Physician’s acknowledgements supplement the IPAs and are signed by the guarantors. Ascentium also emphasized that Ascentium made no representations or warranties regarding the MHT Program and that MHT’s performance or non-performance has no effect on a Doctor LLC’s obligations under the IPA. Ascentium quoted the “Physician’s Acknowledgement,” in which the physicians, on behalf of the Doctor LLCs, acknowledged:

- “[Ascentium] ha[s] no knowledge about the [financed] Assets and ma[d]e no warranties concerning them;”
- “[Customer has] chosen [MHT] and the Assets in [Customer’s] sole judgment;” “Once [Customer] direct[s] [Ascentium] to pay [MHT] and [Ascentium] ha[s] done so, [Customer is] unconditionally obligated to make all of the payments specified in the [IPA] even if ... [MHT] does not honor any contract, agreement or warranty it might have with [Customer] or given to [Customer];” and
- “[Customer] must make all payments required by the [IPA] and perform [its] other duties under it whether or not the Software performs as represented by [MHT] and regardless of whether [Customer is] able to receive the services created or anticipated to be created by it.” R.Doc. 24, p. 5.

50. Ascentium also argued that it had performed verbal verifications with some of the physician-owners. In these verbal verifications, Ascentium reportedly called the borrower to “triple-check,” in Ascentium’s words, the guarantor’s understanding and agreement before funding with colloquy such as:

- The IPA is a “66 month, non-cancelable Agreement;”
- “[R]egardless of any success or failure under any program you may have entered into with America’s MHT, that you and any personal guarantors are obligated to Ascentium Capital for the total number of payments as outlined in the [IPA];” and
- “[Y]our obligation to Ascentium Capital is a direct, non-cancelable obligation between yourself and Ascentium Capital, and ... will not be discharged until the terms of the monthly payments under the [IPA] are completely fulfilled.” R.Doc. 24, p. 5.

51. In sum, Ascentium argued that if a class member never spoke with Ascentium until long after the IPAs were signed, then Ascentium did not mislead them into signing the IPA guaranties. Further, Ascentium asserted:

“Plaintiffs do not explain why it is ‘obvious’ that they—a group of highly-educated doctors—did not understand or consent to the terms of the IPA. ‘Absent fraud, misrepresentation, or deceit, a party is bound by the terms of the contract he signed, regardless of whether he read it or thought it had different terms.’ ... Plaintiffs are highly educated doctors who voluntarily signed up for a business venture. It was up to them to decide whether MHT’s business model was viable and worth the price and risk.” R.Doc. 24, p. 10.

52. Contending that there was little likelihood of success, Ascentium stated that Plaintiffs’ claims “are particularly ill-suited for class treatment.” R.Doc. 24, p. 18.

53. Ascentium also aggressively attacked Plaintiffs’ claims in a Motion to Dismiss in which it stated that:

“Plaintiffs are attempting to avoid their valid payment obligations under fully enforceable contracts with Ascentium because the business ventures they chose to enter with an unrelated entity, America’s MHT, Inc. (“MHT”), did not perform as they hoped. But a purchaser’s dispute with an auto maker regarding alleged defects in a new car provides no grounds for withholding payments to the third-party lender that financed its purchase. And the same is true here. As Plaintiffs acknowledged in their contracts, Ascentium is an unrelated third party that merely provided financing for Plaintiffs’ purchases from MHT. It did not sell the products or services at issue, and it has no liability of any kind arising from the allegations in the Complaint. Accordingly, the Court should dismiss all claims asserted against the Ascentium Defendants in this action.” R.Doc. 30, p. 1.

54. In its motion to dismiss, Ascentium also urged:

“[There] are no well-pleaded allegations that the Ascentium Defendants committed a false, misleading, or deceptive act under the DTPA or that any actions by the Ascentium Defendants were the producing cause of Plaintiffs’ damages. There are no well-pleaded allegations that Plaintiffs did not consent to their agreements with Ascentium or that the agreements lacked consideration; instead, the Complaint affirmatively establishes that there was consideration. Similarly, there are no well-pleaded allegations that the agreements with Ascentium were unconscionable. Rather, the contracts show clearly on their faces exactly what Plaintiffs owed. And they show just as clearly that Ascentium was not guaranteeing the quality of the products and services purchased from MHT.” R. Doc. 30.

55. Ascentium even sought to have the case dismissed based upon the Fifth Circuit’s general seven factors (the *Trejo* factors) in deciding whether to dismiss a declaratory action.

56. Class Counsel vigorously disagreed with Ascentium’s arguments, both legally and factually. Following Ascentium’s opposition, Class Counsel used the fruits of its continued factual investigation to bolster its effort for injunctive relief and its opposition to Ascentium’s motion to dismiss.

57. Class Counsel presented evidence to the Court that employees of MHT were asked to forge—and did forge—physician signatures to documents, including IPAs.³ According to former MHT employee, Paige Segovia: “I heard conversation during which ... [Wertzberger, an officer of MHT] requested that a member of MHT’s sales force (Bradley Leire) cease his practice of signing financial documents for physicians without the authority to do so.”⁴

58. Many class members were presented only signature pages to sign—without the other pages showing the terms of the agreement—by the aggressive MHT sales team who were agents-in-fact for the Lenders, including MHT’s Bradley Leire.⁵

³ See Declaration of Emily Jordan, ¶¶ 12-20. (R. Doc. 33-1).

⁴ See Declaration of Paige Segovia at ¶ 28. (R. Doc. 33-1).

⁵ Scott Hensley, a salesperson with MHT and agent-in-fact for Ascentium and later Univest and Balboa, has attested that he “was concerned about Leire’s practice of show up at closing with only signature pages and encouraging me to do the same.” See Declaration of Hensley, ¶ 13. (R. Doc. 33-1).

59. Class Counsel informed the Court that Balboa continued to fund licenses even after the filing of this litigation and that MHT's Scheme was so prevalent and pervasive that MHT provided payments to salespeople while at the same time MHT reportedly failed to withhold employee tax payments, medical insurance, and other employee benefit payments, even though these funds were supposedly withheld from MHT employee's paychecks.⁶

60. In opposition to the motion to dismiss, Class Counsel urged that Plaintiffs' filing of this lawsuit in the Northern District of Texas is entirely consistent with the purpose of the Declaratory Judgment Act.

61. As to Defendant's posit that "*A purchaser's dispute with automaker does not provide grounds for withholding payments to the third-party lender,*" Plaintiffs urged that they seek redress for being victimized and relief from a personal guaranty that they were tricked into by forgery and/or deceit, and the relief Plaintiffs seek is narrowly tailored to discrete injunctive and declaratory relief. Class Counsel also referenced the bevy of declarations and factual support for the fraud it asserted in opposition to the motion to dismiss. R.Doc. 35.

62. In its Order, the Court denied both motions, but left the Plaintiffs free to pursue the case, provided that a Master Complaint properly stating causes of action would be filed, and in which the facts substantiating fraud would be alleged with particularity. R. Doc. 39. Class Counsel continued to work diligently and intensely to develop additional facts supportive of the Class' case and continued to maintain contact with counsel and unrepresented physicians from around the country involved in the MHT program and related litigation.

63. Shortly thereafter, Class Counsel began to prepare the amended global complaint ordered by the Court.

⁶ See Declaration of Christopher Cervantes, p. 6, ¶ 28. (R. Doc. 33-1).

64. Class Counsel conducted additional, extensive document reviews and interviews with the six Plaintiffs named in the four original complaints, to assure that all important and salient facts were properly reviewed and presented and to recount the details of all meetings and communications between the Plaintiffs and Defendants.

65. The end result was an extensive pleading—with some drafts reaching nearly two hundred pages. A final draft of the Master Complaint was completed, and it was filed with this Court on September 18, 2017. R. Doc. 57.

66. As this litigation was unfolding, and during the course of counsel's investigation and the Court's consideration of Class Counsel's Motion for Injunctive Relief, MHT's collapse ultimately culminated with its May 15, 2017 bankruptcy filing. In seeking Chapter 7 relief, MHT initially listed its assets with a value of less than \$1 million, despite having received in excess of \$50 million dollars over roughly three years for sales of bogus licenses.

67. On behalf of the Class, Class Counsel has contended with and addressed the impact of the MHT bankruptcy in terms of the stay order entered into this case and has monitored the proceedings in the bankruptcy court. R.Doc. 44.

68. On a separate front, beginning in April of 2017, counsel for Ascentium and Class Counsel began to have substantive and professional settlement negotiations, but at times the discussions were intense and contentious. The settlement negotiations were directed at settling the claims asserted by class members against Ascentium and underlying claims that Ascentium intended to pursue against class members in Subclasses One, Two, and Three.

69. Class Counsel and counsel for Ascentium began discussing models and approaches to arrive at a resolution that would be fair, reasonable and adequate to the class as a whole, and

which Class Counsel could recommend. Class Counsel and Ascentium continued to explore approaches to reach a global settlement, which took into account likely subclasses.

70. During the several months of discussions and negotiations among Class Counsel and Ascentium, counsel considered many variables and factors including the following: the number of IPAs associated with a given physician, the booked outstanding indebtedness associated with each Doctor LLC, the degree and extent of participation and Centers for Medicare & Medicaid Services billing by the Doctor LLC, the time frame in which the IPA was executed in relation to the degree of evidence establishing Lender awareness or reasonable awareness of the fraudulent nature of the scheme, and what remedies and administrative process would be made available to the Class Members beyond a release from claimed indebtedness in exchange for lesser settlement payments.

71. Beyond the fairness of specific terms and commercial nature of various possible settlement models, Class Counsel had numerous discussions and debates over how to best approach class certification with an eye toward precedent and procedural options that would achieve the best possible result; that could be negotiated with Ascentium; and that would be fair, reasonable and adequate to the class.

72. These discussions extended through a mediation, which was conducted over the course of a long business day on July 28, 2017. Though the discussions were productive, settlement was not achieved, the parties and mediator stayed engaged and continued to work toward a resolution. See R.Doc. 52.

73. Throughout these discussions Class Counsel consulted with and received input from the several attorneys and unrepresented physicians with whom they had been in contact. Class Counsel traveled to the location of cooperating attorneys to meet and discuss issues and

status. In addition, Class Counsel retained an accountant as a consultant to assist in the evaluation of possible models proposed, analyzed and considered during the course of settlement negotiations.

74. Class counsel conducted extensive research and analysis to better understand the impact and legal effect of the settlement being proposed on the reserved claims, the unreleased claims, and the bankruptcy and potential claims class members might wish to assert. Specifically, from their many discussions with interested guarantors and lawyers, it was clear that many guarantors desired to retain their rights to pursue Postle, MHT, and other related persons.

75. In early August 2017, Class Counsel and counsel for Ascentium reached an agreement in principle.

76. The agreement included confirmation from Ascentium that there would be no efforts to collect against guarantors during pendency of litigation and no negative credit reporting against putative class members or named Plaintiffs.

77. Because it was the way to best achieve a fair, reasonable and adequate settlement for the class as a whole, Class Counsel and Ascentium had multiple discussions regarding the need to include relief to class members who were alleged to have guarantee obligations to both Ascentium and Univest. Univest was brought into the settlement discussions, and it ultimately agreed to be included in the settlement. Univest's participation was essential. Otherwise, it would have been difficult to resolve the claims of the class as constituted.

78. Class Counsel also had extensive negotiations over the payment to Subclass Four (involving Balboa IPAs) in exchange for the release of those class members' claims against the Settling Defendants. While members of Subclass Four never acknowledged the lack of a claim against Settling Defendants regarding their alleged Balboa loan obligations, Ascentium and

Univest pointed to what they claim is a lack of evidence to support any theory of liability against Settling Defendants by Subclass Four members.

79. The parties then spent six weeks negotiating and drafting a Settlement Agreement and requisite legal terms that were satisfactory to Class Counsel, Ascentium, and Univest. The negotiations over terms, conditions, and language in the settlement agreement and subsequent pleadings and Order presented to the Court were involved, intensive, and time consuming.

80. Considerable attention was paid as to how to fairly, reasonably and adequately treat varying class members and how to craft potential subclasses such that the overall settlement and treatment of subclass members would be fair, reasonable and adequate overall.

81. The parties negotiated and ultimately determined that the primary distinction between subclasses (in addition to Lender based categories) should be the time frame in which each allegedly entered into IPA guarantees—i.e., pre-2016 or post-2016.

82. This distinction takes into consideration such factors as the degree of the MHT fraudulent scheme and knowledge of the Defendants, the extent and duration of the class members' participation in the MHT program, and the level of outstanding payments owed under IPAs—all premised on the extensive evidence obtained and developed by Class Counsel.

83. The preeminent and controlling factors in the settlement negotiations was that any negotiated payment obligations of the subclasses must be fair, reasonable, adequate fully considered, and based on fact. Class counsel believe that the settlement terms—which were arrived at only after lengthy negotiations—meet those essential criteria.

84. The payments in favor of Subclass Four members with Balboa IPAs were determined by the amount of IPA guarantees each member had and were also the product of hard fought negotiations.

85. The Settling Defendants staunchly contested any role or participation in Balboa IPAs and only agreed to provide any consideration to this subclass in exchange for global peace.

86. In the latter part of September 2017, only after Class Counsel, Ascentium, and Univest had reached an agreement on the proposed settlement, Class Counsel and counsel for Ascentium began negotiations for an attorney-fee award. Specifically, the issue of attorney's fees was not addressed or negotiated until after the parties reached consensus and agreement on the terms of the settlement as it pertains to the Class.

87. Following agreement among the parties, Class Counsel drafted the motion to preliminarily approve the settlement and related pleadings.

88. Upon the entry into the proposed Stipulation of Settlement, Class Counsel continued to reach out to and consult with the various attorneys and class members impacted by the proposed settlement. Class Counsel have participated in numerous conference calls with class members and with interested counsel who are not Class Counsel or otherwise participants in the class action.

89. Class Counsel continued discussions and analysis of various questions and concerns by potential class members.

90. As the exclusion date, February 26, 2018, approached, these discussions, consultations, researched analyses, and responses intensified.

91. Class Counsel's efforts continue through the present, including the briefing, preparation for and attendance and preparation at the fairness hearing on March 12, 2018.

E. Post-Settlement Activity

92. Subsequent to confecting the Stipulation and obtaining the Court's preliminary approval, Class Counsel has worked to answer questions of the class and address issues raised by various class members.

93. Several class members questioned the tax implications of the proposed settlement. Class Counsel has been very clear to each and every person raising tax issues or concerns that Class Counsel are not tax lawyers, do not offer tax opinions, and will not offer tax opinions or tax advice in this matter. However, in order to provide basic information to assist class members in their analysis and further discussions with their own tax advisors, and ultimately whether accept the proposed settlement, Class Counsel engaged CPA Al Courcelle, and asked Mr. Courcelle to provide general background and opinions from a big picture standpoint *See* Courcelle opinion attached as Exhibit DM-1. That opinion letter reflects that there should be no unusual adverse tax consequence to the Class Members as a result of the settlement at issue, subject to each member's individual tax history and barring any unknown special circumstances.

94. Class Counsel has also obtained from Univest and Ascentium written confirmation that neither intends to file 1099s with regard to any Class Member as a result of the settlement payments. *See* Exhibits DM-2 and DM-3. Class Counsel has engaged in multiple discussions with class members and counsel regarding concerns about tax issues. The overwhelming majority of persons familiar with the facts and who have analyzed the issue have recommended or agreed to the settlement.

95. Various potential Class Members have sought to have attorney's fees which they have expended be reimbursed through this litigation.

96. As to attorney's fees, Class Counsel has not charged a fee to any class member nor received any compensation to date and is aware of no impediment to any Class Member's individual attorney making an application to this Court for an award of common benefit fees. Similarly, no class member has been charged or billed for any litigation expenses incurred by Class Counsel.

97. As set forth below in this Declaration, Class Counsel has reached agreements with independent, non-Class counsel who have, in fact, dispensed legal services that have benefited the class overall. Those two firms have charged their clients, who are also class members, fees relative to their services, and those firms have sought reimbursement from their class member clients for expenses they have incurred. It is those charged and incurred fees and costs that Class Counsel is submitting to the Court for consideration as part of a fee and expense award.

98. Class Counsel has received and addressed complaints that the settlement payments are too high and the Settlement is objectionable on that basis.

99. Class Counsel sought to obtain a settlement involving the least amount of payments from Subclasses One, Two, and Three in exchange for a full release of all alleged guarantee obligations. Class Counsel also sought to recover the most amount of payments to Subclass Four. In that light, Class Counsel firmly believe that they obtained Settling Defendants' best offer, and it is their professional opinion and judgment that they have negotiated fair, reasonable, and adequate settlements on behalf of the class. Class Counsel has made reasonable efforts to communicate all of the facts relevant to the proposed settlement to all objectors and other members of the class.

III. PROPOSED SETTLEMENT

A. Terms of Settlement

100. The proposed settlement defines the “Settlement Class” as consisting of the “MHT Program Class,” and “Subclass One” through “Subclass Four.” The “MHT Program Class” is defined as every person who is currently listed in Ascentium’s, Univest’s, and/or MHT’s books and records (including without limitation MHT’s bankruptcy schedules) as a Guarantor and/or as an owner of a Doctor LLC. “Doctor LLCs” were entities created by MHT for physicians to participate in the Program.

101. Subclass One is defined as every member of the MHT Program Class who (a) is not a Guarantor of an Univest IPA but (b) is a Guarantor of an Ascentium IPA with (i) a “book date” of January 1, 2016, or later stated in Ascentium’s books and records and (ii) a balance outstanding on August 31, 2017. Subclass Two is defined as every member of the MHT Program Class who (a) is a Guarantor of a Univest IPA and (b) is also a Guarantor of an Ascentium IPA with (i) a “book date” of January 1, 2016, or later stated in Ascentium’s books and records and (ii) a balance outstanding on August 31, 2017. Subclass Three is defined as every member of the MHT Program Class who is a Guarantor of an Ascentium IPA with (i) a “book date” of December 31, 2015, or earlier stated in Ascentium’s books and records and (ii) a balance outstanding on August 31, 2017. Subclass Four is defined as every member of the MHT Program Class who is a Balboa Guarantor but not a Univest Guarantor or an Ascentium Guarantor.

102. The consideration to the settling class and subclasses includes the following: there is class-wide injunctive relief by Ascentium’s and Univest’s agreement to (i) refrain from any negative credit reporting against any Potential Class Member for alleged indebtedness up to Final Judgment; (ii) retract any extant negative credit reporting for anything prior to Final Judgment;

and (iii) refrain from any further collection efforts or negative credit reporting against any Potential Class Member which is not based upon the settlement payments. There is a release from all claimed obligations under the Ascentium and Univest IPAs.

103. The Settlement Consideration due from each member of Subclass One and each member of Subclass Two shall be the lesser of (i) \$85,900.50 (75% of the total of all monthly payments due under one Ascentium IPA covering the purchase of one MHT license in 2016) and (ii) 80% of the total of all payments remaining due under the original terms of all Ascentium and Univest IPAs for which such subclass member is listed as a Guarantor. This is to be paid in sixty (60) monthly installments. Although contested by Plaintiffs, many of the members in this case are on the books as guaranteeing up to four IPAs.

104. The Settlement Consideration due from each member of Subclass Three shall be the lesser of (i) \$114,534.00 (100% of the total of all monthly payments due under one Ascentium IPA covering the purchase of one MHT license in 2016) and (ii) 80% of the total of all payments remaining due under the original terms of all Ascentium and Univest IPAs for which such subclass member is listed as a Guarantor. This is to be paid in forty-eight (48) monthly installments.

105. The benefits to these subclasses are substantial as nearly every class member is claimed to have at least two IPAs with outstanding amounts and the majority of class members allegedly obliged as guarantors of four IPAs. Altogether the scale of released contested claims under IPAs is \$52,000,000 in exchange for settlement payments of approximately \$15,000,000—a difference of approximately \$37,000,000. Moreover, all subclasses have the additional consideration in the form of an early payment option which would result in a 20% discount of the applicable termed settlement amount. None of the IPAs provided for this benefit, and it was achieved solely due to Class Counsel's persistence, efforts, and ultimately successful negotiations.

106. The doctors alleged to guarantee Balboa IPAs are not receiving releases of contested claims in the same manner by virtue of this settlement. Neither Ascentium nor Univest have the authority to bind Balboa to reducing the alleged Balboa guarantees. However, the Settling Defendants agree to total payments of up to \$390,000, to these doctors who comprise Subclass Four.

107. In exchange for this consideration, the class members agree to release all claims against the Settling Defendants, although it is believed that none of these doctors had IPAs with Ascentium or Univest.

B. Class Counsel's Fee

108. The above-described arms-length negotiations and bargaining, combined with the risks presented in any litigation, show the precarious nature of achieving settlement. Despite substantial effort and expenditure of thousands of hours of time and resources, there is and always has been substantial risk whether Class Counsel would receive any fee for their services and value provided to the putative class.

109. The course of this litigation demonstrates the fact that the mere filing of an action does not ensure that there will be any settlement or fee.

110. In fact, there were times during the litigation when it was possible that Plaintiffs' claims could have dismissed with prejudice.

111. Thus, there was a demonstrable risk that the Class and its counsel would invest substantial efforts and receive nothing. It took hard and diligent work by skilled counsel to develop facts and theories that allowed the case to go forward and ultimately persuade defendants to enter into serious settlement negotiations. If defendants believe they will prevail, experience shows that they will litigate to the end.

112. Losses such as those described above are exceedingly expensive and can often threaten the survival of a law firm. Onlookers often focus on the aggregate fees awarded but fail to take into consideration that those fees are used to cover enormous overhead expenses incurred during the course of the litigation, are taxed by federal, state, and local authorities, and, when reduced to a bottom line, are far less imposing to each individual firm involved than the aggregate fee awarded appears.

113. When Class Counsel undertook to act for the Plaintiffs in this matter, counsel were aware that the only way counsel would be compensated was to achieve a successful result. The benefits conferred on Plaintiffs and the Class by this settlement are particularly noteworthy, to wit: a release of claims in excess of \$52 million was obtained for the Class in exchange for payments of \$15 million despite the existence of substantial risks and Defendants' vigorous assertion of defenses. The value of the proposed class settlement to members of Subclass Four is up to \$390,000 in cash payments to class members, and other non-monetary benefits were conferred upon Subclasses One, Two, and Three. The non-monetary benefits include the assurance that no class member would be subject to negative credit reporting for actions and inactions prior to final settlement of the class, assurances that during the pendency of the class settlement, no class member would be subjected to collection efforts by Settling Defendants, an early payment option, the spreading out of payment on the amount of monies class members will pay to Ascentium and/or Univest, the reservation of class members claims against non-settling parties, and other relief.

114. Class Counsel accepted this case on a wholly contingent basis. Counsel knew from the outset that they might expend millions of dollars in attorney time in pursuing this litigation on behalf of the Class and receive no compensation if the litigation ultimately proved unsuccessful.

Class Counsel gave it their all—with no assurance of success. All of Class Counsels’ effort and time was expended without any certainty of payment.

C. Standing and Expertise of Class Counsel

115. The expertise and experience of Class Counsel are described in the declarations of Class Counsels’ law firms to be presented at the Fairness Hearing and in the previous submissions to this Court.⁷ In short, Class Counsel consists of three law firms with senior lawyers assuming key roles in this case. Each firm has deployed capital and professional resources of great value, and the lawyers from each firm dedicated significant time and energies to this fast track case. The efforts of Class Counsel, and deployment of valuable resources by each Class Counsel firm are the principal reason that this case was brought to a rapid proposed settlement that is highly favorable to the class.

116. Bringing this case to an expedited conclusion was in the overwhelming best interest of class members. The level of anxiety and angst among class members regarding the uncertainty of what they may owe Ascentium and/ or Univest, if anything, and when they would be called to pay, was consistently present in this matter. Ascentium and Univest were represented by competent and aggressive counsel who strongly preferred to engage individual suits against class members, in venues inconvenient to class members, and engage in negative and damaging credit reporting against putative class members in the interim of filing such suits. The overmatch of resources of Ascentium and/ or Univest versus individual class members was to the disadvantage of class members. Moreover, the legal costs that would likely be incurred while litigating individual matters would probably approach the actual settlement amounts proposed in this agreement. Moreover, the likelihood that class members would not recover their out of pocket

⁷ See R. Doc. 59-2.

legal costs and expenses if the cases were handled individually was a real and substantial risk. And worse, there was an ever-present risk that under certain language in the IPAs, class members would be called upon to pay Settling Defendants' legal expenses and costs, which likely would be quite substantial.

117. The proposed settlement presents certainty for class members regarding what they will owe, and when, and in the case of Subclass Four, provides a cash payment from entities who allege a tenuous, at best, connection with any of the Balboa IPAs.

118. Bringing the matter to an early conclusion, rather than expending significant time, valuable Court time and resources, as well as the energy and expense of both litigants and counsel provides a significant benefit to the class, litigants, Court, and legal system as a whole. In this case, "sooner" is in fact better and highly favorable to the class.

119. The issues posed in this case are both novel and complex. Unlike many fraud-based class action and mass joinder cases, this case involves the rescission of alleged indebtedness based on fraudulently procured guarantees. The lenders inevitably rely on clauses in their respective agreements, known as "Hell or High Water" clauses, which in ordinary circumstances would insulate lenders from acts and omissions perpetrated by third persons. The factual investigation, assessment of the salient facts vis-à-vis applicable law, and the proper framing of legal theories and arguments to bind the lenders, as persons with knowledge, scienter and participation in the MHT Scheme was both time consuming and extremely involved. Moreover, efforts to assess all known facts and create a settlement with appropriate subclasses that would meet the requisites of class certification and would be fair, reasonable and adequate under the circumstances required thought, research, and skillful drafting. It required working with consultants engaged by Class Counsel as well as significant work and effort by Class Counsel. Through intense and dedicated

effort, Class Counsel facilitated the proposed settlement, which we believe meets all requisites of class certification and is highly favorable to the class and all subclasses.

120. Gaining a complete and thorough understanding of the facts, law and legal arguments of Settling Defendants was essential in order to properly craft proposed class action lawsuits in which multiple actual common issues of fact and law were presented by suitable class representatives with claims typical of unnamed class members. Skill, effort, and tenacity by Class Counsel were essential for the presentation of what is presented as a simple request for relief that applies class wide, where using class procedure is not only permissible but indeed preferable and far superior than individualized resolution of claims, likely in multiple jurisdictions across the country.

121. The time limitations in this matter have been driven by several colliding factors: the anxiety and angst among class members to get resolution of what, if anything, they owe to Settling Defendants and certainty of when and what must be paid; the strong desire of Settling Defendants to collect any monies that may be due to them on an expedited basis, bearing in mind that the present value of whatever they might collect would be less if there were protracted delays; the possibility of substantial legal expenses incurred by the Settling Defendants; the possibility of class members being held responsible for Settling Defendants' legal fees pursuant to certain provisions of the IPAs; the fact that engaging in extensive litigation would both increase and reduce risk to litigants. Thus, it was optimal to negotiate sooner than later in the proceedings.

122. Multiple alleged-guarantor class members around the country retained private counsel, who have filed individual lawsuits, or sought to defend lawsuits brought by some of the Settling Defendants. Even so, no other lawyers or firms other than Class Counsel have crafted arguments and presented them in proceedings that would or could bring global relief to class

members who wish to participate. There was a belief among others that using class action procedure would stall and impede the progress of the cases, rather than further resolution, and that certifying a class would be difficult. Many were intimidated by class action procedure and found the handling of a class action a daunting and overwhelming commitment. Many doubted that class action practice would result in expedited settlement negotiations, and some doubted that a proposed settlement that would be highly favorable to the class would or could be negotiated and proposed to the Court in a relatively short span of time. Of course, the overwhelming majority of interested persons preferred a fair, reasonable and adequate settlement on a fast track basis. Class Counsel have been the only lawyers willing to assume the risks and commitment necessary to accomplish the proposed settlement.

IV. COUNSEL’S REQUEST FOR REIMBURSEMENT OF EXPENSES IS REASONABLE AND SHOULD BE APPROVED.

123. Each Class Counsel firm will submit declarations at the Fairness Hearing setting forth the amount of the expenses incurred and personnel time expended over the course of the litigation.

124. As Class Counsel, I am familiar with the expenses incurred by Class Counsel. These expenses were reasonably and necessarily incurred, are reasonable in amount and, therefore, should be reimbursed.

125. The named class representatives in this case have been and remain willing to participate in discovery and were instrumental in initiating and advancing the present case and warrant an Incentive Award as prayed for due to their services.

126. Specifically, Dr. Derek Melby (Subclass One), Dr. Danilo Policarpio (Subclass Two), Dr. David Guillot (Subclass Three), and Dr. Jaideep Patel (Subclass Four) have reviewed multiple drafts of the Complaints (and in Dr. Guillot’s case, the Complaint of Intervention). Each

has spent multiple hours of their time reviewing the detailed facts and circumstances of their involvement with MHT and the lender(s) involved in their guarantee transactions. Each is scheduled to travel from the homes, all outside of Texas, to prepare for and attend the Fairness Hearing on March 12, 2018 and give live testimony or written declaration in lieu of live testimony. Each has given additional time and effort not required of or provided by other class members, and their efforts have benefited the class.

127. Reasonable enhancements, in line with the jurisprudence, are appropriate and are respectfully requested.

128. For the avoidance of any doubt, Class Counsel is requesting that the enhancements sought for class representative Melby, Policarpio, Guillot, and Patel come from the fee and cost funds agreed to by Settling Defendants.

129. Additionally, Class Counsel has agreed to not oppose and to include in its submission the fee reimbursement from two law firms which provided common benefit services in this litigation.

130. Attorney Isaac Tawil has represented five physician Class Members in the McAllen, Texas area. Each of Mr. Tawil's clients has agreed to the settlement. Mr. Tawil met with me early in the case, and Mr. Tawil has remained in communication with me since then. Mr. Tawil filed lawsuits in the 398th Judicial Court for the State of Texas, County of Hidalgo. I have communicated and collaborated with Mr. Tawil since our initial meeting, and as the matter developed, particularly as to settlement, I collaborated with Mr. Tawil as to his thoughts and recommendations.

131. Mr. Tawil's clients have been billed \$25,608.33 in fees for his services and have incurred \$11,375.25 in expenses. Mr. Tawil's contributions added value to the class and proved to

be for the common benefit for the class. Mr. Tawil's fee and costs submission is in line with the value of the benefit his efforts and collaboration brought to the class overall.

132. Class Counsel requests that these amounts be included in the award of attorney's fees and reimbursement of expenses by this Court.

133. Attorney Kirk Morgan, with the firm of Smith Haughey Rice & Roegge represents nine class members each located State of Michigan. Each of Mr. Morgan's clients has agreed to the settlement.

134. Prior to my interactions with Mr. Morgan, he has extensively researched the matters central to the MHT scheme, primarily under Michigan law. In addition, Mr. Morgan, in connection several of his clients, had begun investigating the facts central to the MHT program. During our initial discussion, and ever since, Mr. Morgan has been forthcoming and collaborative regarding facts and details of his investigatory efforts. In addition, Mr. Morgan located and retained a bankruptcy lawyer in the Dallas area to represent his clients and others in the MHT Bankruptcy proceeding. Mr. Morgan freely shared information regarding that proceeding, including transcripts and other matters. I have spoken with Mr. Morgan multiple times, and he has invited me to engage with his clients to discuss settlement.

135. Mr. Morgan made significant contributions in communicating negotiations with class members, coordinating the national efforts of lawyers representing physicians in MHT bankruptcy litigation, and in raising and developing defenses against the IPA guarantees.

136. Throughout my multiple interactions with Mr. Morgan, he has brought value to the class, and his efforts have been to the common benefit of the class. Mr. Morgan's fee and cost submission is in line with the value of the benefit his efforts and collaboration brought to the class overall.

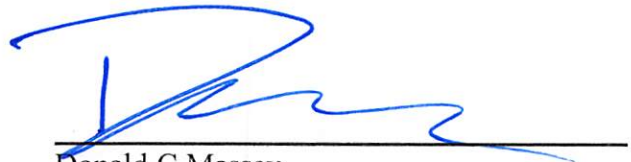
137. Mr. Morgan's clients have been billed \$119,269.50 in fees for his firm's services and have incurred \$5,075.38 in expenses.

138. Redacted records of these fees and expenses are attached hereto as Exhibit DM-4 and the Class Counsel requests that these amounts be included in the award of attorney's fees and reimbursement of expenses by this Court.

V. CONCLUSION

139. For the reasons set forth in this Declaration and in the Memoranda In Support Of Motion For Final Approval Of Partial Class Action Settlement And For An Award Of Attorney's Fees, I respectfully submit that (i) the settlement is fair, reasonable and adequate and should be approved; and (ii) the application for attorney's fees and reimbursement of expenses should be granted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, executed on March 5, 2018, at New Orleans, Louisiana.



Donald C Massey

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2018, a true and correct copy of the foregoing declaration was served on all counsel of record through the Court's electronic filing system.

/s/ Jonathan P. Lemann
Jonathan P. Lemann

Exhibit DM-1



January 26, 2018

Couhig Partners, LLC
Attention: Jeff Pastorek, Rob Couhig, Don Massey, and Jonathan Lemann
1100 Poydras St.
Suite 3250
New Orleans, LA 70163
Via: Email

Re: MHT Settlement Opinion

Dear Gentlemen:

I was asked to give an opinion on the tax implications of the proposed settlement between your client(s) and the lenders, Ascentium and Univest. From my understanding, America's MHT set up LLCs to administrate and manage the operations of nurse practitioner practices. Although the doctors were the sole members of LLCs associated with each doctor, America's MHT retained the control, oversight and management of these LLCs. The doctors executed Installment Purchase Agreements (IPAs) with the lenders based on multiple false representations of MHT representatives and others, with the LLCs allegedly associated with the doctors being the obligors and the doctors being the guarantors. As soon as a doctor executed an IPA, America's MHT sought and received wire transfers for each IPA directly to America's MHT, unbeknownst to the doctors. The LLCs defaulted on loan payments to the lenders. As a result, the lenders sought payment from the doctor guarantors when these loans defaulted. The doctor guarantors vigorously contested that they owed anything to lenders under the guarantees or any other theory. The lenders reached a proposed settlement with the doctor guarantors under which the lenders have agreed to discharge or otherwise forgive a significant portion of the guarantee obligations for each doctor guarantor, and not to issue form 1099-C as a result of the fraudulent nature these loans were originated. The questions presented to us are as follows:

- A. Do the doctors have a tax consequence for the forgiveness or discharge of large amounts of alleged guaranties?
- B. Are the doctors able to expense the payment of a guaranty in the tax period(s) in which they make the payments?

The following represent the tax treatment of the above transaction, as well as the recovery or reduction of debt:

- A. Doctors should not have a tax consequence as a result of the forgiveness or discharge of the alleged Ascentium and/or Univest guarantees. The amount of debt forgiven should not be considered income for the tax period that the discharge occurs, however, because of the settlement that allows for the reduction of the debt owed to the lenders, we advise that the taxpayer should only be able to claim the net loss guaranteed. Per Section 165 of the IRS Tax Code, a taxpayer shall be allowed as a deduction any loss sustained during the taxable year. This includes theft losses, which are deductible in the year discovered and not compensated for by insurance or otherwise. Assuming that the doctors have not taken deductions for any

theft losses related to this fraudulent transaction, each would be entitled to a theft loss deduction of the net loan amount guaranteed in the year that the fraud was discovered. It is suggested that each doctor consult his tax advisor for the potential deduction amount to be claimed.

Should a doctor have previously claimed a tax deduction for the theft loss as a result of the loans or guarantees, we recommend he discuss the tax treatment with his tax advisor.

- B. Under Section 163 of the IRS Tax Code, interest paid or accrued within the taxable year on indebtedness shall be allowed as a deduction. If the actual interest charge cannot be ascertained, a portion of the payments made during the taxable year under the contract shall be treated as interest and is deductible under section 163(b). This is relevant to the note payments in which the doctors are ultimately deemed responsible for, however, as mentioned above, the net loss is fully deductible in the year it was discovered. Please note that the recent Tax Act that was signed into law by President Trump limits of the deduction for interest expense, which may affect the doctors, beginning 1/1/18. It is suggested that each doctor consult his tax advisor regarding the effect of this Act on the deductibility of interest expense paid on these guarantees.

As you know, each individual tax situation is unique, and we advise that your client(s) contact their tax advisors regarding the deductibility of the theft losses, as well as any losses that may have been claimed in a prior tax year. Returns claiming theft loss deductions may be subject to examination by the Internal Revenue Service.

Should you have any questions, please do not hesitate to contact me at the number listed or email at awc@ac-consultant.com.

Sincerely,

Albert W. Courcelle III, CPA

Exhibit DM-2

Vinson&Elkins

Matthew R. Stammel mstammel@velaw.com
Tel +1.214.220.7776 Fax +1.214.999.7776

February 6, 2018

By E-Mail to:

Donald C. Massey (dmassey@couhigpartners.com)
Couhig Partners LLC
1100 Poydras St., Ste. 3250
New Orleans, Louisiana 70163

Re: *Melby, et al. v. America's MHT, et al.*, Civil Action No. 3:17-cv-155-L

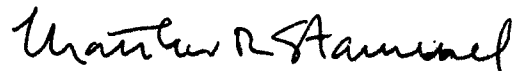
Don:

You have asked whether Ascentium Capital LLC ("Ascentium") intends to issue Forms 1099 to the doctors who participate in the settlement pursuant to the Stipulation of Settlement executed on September 26, 2017, as noticed to potential class members by letter in December 2017 from the Administrator for the U.S. District Court, Northern District of Texas, Dallas Division.

Pursuant to Treasury Regulation § 1.6050P-1(d)(7), Ascentium does not intend to issue Forms 1099 (including Forms 1099-c) to the doctors who participate in the class action settlement reflected in the Stipulation of Settlement.

As you know, we do not represent Univest and cannot speak on its behalf. We believe that Univest will be taking this same position but this needs to be confirmed by counsel for Univest.

Sincerely,



Matthew R. Stammel

US 5465787

Exhibit DM-3

William R. Hinchman
Direct Dial: (215) 569-2796
Email: whinchman@klehr.com

February 6, 2018

VIA EMAIL

Donald C. Massey (dmassey@couhigpartners.com)
Couhig Partners LLC
1100 Poydras St., Ste. 3250
New Orleans, Louisiana 70163

Re: Melby, et al. v. America's MHT, et al., Civil Action No. 3:17-cv-155-1

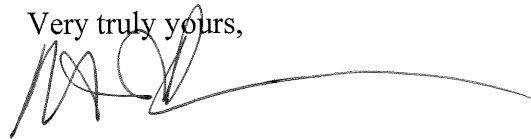
Dear Don:

Our firm is counsel to Univest Capital, Inc. ("Univest").

I have been informed by Ascentium's counsel that the doctors who participate in the settlement pursuant to the Stipulation of Settlement executed on September 26, 2017, as noticed to potential class members by letter in December 2017 from the Administrator for the U.S. District Court, Northern District of Texas, Dallas Division, have asked whether Univest Capital, Inc. intends to issue Forms 1099. Pursuant to Treasury Regulation Section 1.6050P-1 (d)(7), Univest does not intend to issue Forms 1099 (including Forms 1099c) to the doctors who participate in the class action settlement reflected in the Stipulation of Settlement.

If you have any questions, please let me know.

Very truly yours,



William R. Hinchman

cc: Client
Counsel to Ascentium Capital LLC

Exhibit DM-4

Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|--|---------|----------------------|-------------|---------------|------|----------|----------|-----------|---------|----------|----------|---------|----------|---------|--------|
| 10/11/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.50 | 750.00 | 300.00 | 2.50 | 750.00 | 300.00 | 10000 | | 805978 | Billed |
| Initial meeting with Doctors Solarewicz, Sandy and Starr regarding contracting issues with America's MHT. | | | | | | | | | | | | | | | |
| 10/17/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.50 | 750.00 | 300.00 | 2.50 | 750.00 | 300.00 | 10000 | | 805978 | Billed |
| Meetings with Doctors Bhatnagar and Ureche regarding America's HMT contracts. | | | | | | | | | | | | | | | |
| 10/26/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.80 | 1,740.00 | 300.00 | 5.80 | 1,740.00 | 300.00 | 10000 | | 805978 | Billed |
| Review following documentation: Ascendum Note and Guaranty, HMT service agreement, limited liability documentation including operating agreement, resolutions and State of Michigan filings, ACO agreement and other miscellaneous documents provided by the physicians. | | | | | | | | | | | | | | | |
| 11/01/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 240.00 | 300.00 | 0.80 | 240.00 | 300.00 | 10000 | | 805978 | Billed |
| Initial meeting with Dr. Zickus regarding America's HMT contract. | | | | | | | | | | | | | | | |
| 11/11/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.30 | 990.00 | 300.00 | 3.30 | 990.00 | 300.00 | 10000 | | 805978 | Billed |
| Write summary of review of all transaction documents and draft correspondence to America's MHT outlining physician group position in advance of Dr Starr's meeting in Dallas. Telephone conference with Dr Starr regarding the physician report and correspondence. Forward to all physicians. | | | | | | | | | | | | | | | |
| 11/22/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 240.00 | 300.00 | 0.80 | 240.00 | 300.00 | 10000 | | 809412 | Billed |
| Write email correspondence to physician group discussing Dr Starr's meeting with MHT in Dallas. Provide recommendations for dealing with both Ascendum and MHT moving forward. | | | | | | | | | | | | | | | |
| 11/25/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 809412 | Billed |
| [No Charge] Receipt of text from Dr Sandy and telephone conference with Dr Sandy regarding meeting next Monday with [REDACTED]. | | | | | | | | | | | | | | | |
| 11/28/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.00 | 600.00 | 300.00 | 2.00 | 600.00 | 300.00 | 10000 | | 809412 | Billed |
| Attend meeting with [REDACTED] and members of physician group to discuss current situation with MHT, Ascendum and physician practices. | | | | | | | | | | | | | | | |
| 11/30/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 360.00 | 300.00 | 1.20 | 360.00 | 300.00 | 10000 | | 809412 | Billed |
| Receipt and review of physician MHT documentation. Telephone conference with Dr Zickus regarding Ascendum correspondence and suggestions for dealing with past due amounts. Telephone conference with Dr Solarewicz regarding [REDACTED] for dealing with MHT and Ascendum. | | | | | | | | | | | | | | | |
| 12/07/2016 | 2324 | Willekes, Holliann M | 30 | Associate | 1 | 0.30 | 63.00 | 210.00 | 0.30 | 63.00 | 210.00 | 10000 | | 809412 | Billed |
| Discussion with Mr. Morgan regarding background and research needed on [REDACTED]. | | | | | | | | | | | | | | | |
| 12/08/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 690.00 | 300.00 | 2.30 | 690.00 | 300.00 | 10000 | | 809412 | Billed |
| Telephone conference with Dr Sandy and [REDACTED]. | | | | | | | | | | | | | | | |
| 12/12/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 809412 | Billed |
| [No Charge] Telephone conference with Dr Bhatnagar. | | | | | | | | | | | | | | | |
| 12/13/2016 | 2324 | Willekes, Holliann M | 30 | Associate | 1 | 1.00 | 210.00 | 210.00 | 1.00 | 210.00 | 210.00 | 10000 | | 809412 | Billed |
| Research regarding [REDACTED]. | | | | | | | | | | | | | | | |
| 12/15/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.50 | 150.00 | 300.00 | 0.50 | 150.00 | 300.00 | 10000 | | 809412 | Billed |
| Attention to various emails from Dr Sandy regarding [REDACTED] and phone conference results with him. Review and approve email from Dr Sandy to [REDACTED]. | | | | | | | | | | | | | | | |
| 12/20/2016 | 2324 | Willekes, Holliann M | 30 | Associate | 1 | 1.80 | 399.00 | 210.00 | 1.90 | 399.00 | 210.00 | 10000 | | 809412 | Billed |
| Reviewed letter from MHT and attached exhibits. Research regarding [REDACTED]. | | | | | | | | | | | | | | | |
| 12/20/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.70 | 1,110.00 | 300.00 | 3.70 | 1,110.00 | 300.00 | 10000 | | 809412 | Billed |
| Telephone conferences with Dr Sandy and [REDACTED] regarding [REDACTED] MHT. | | | | | | | | | | | | | | | |
| 12/20/2016 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 360.00 | 300.00 | 1.20 | 360.00 | 300.00 | 10000 | | 809412 | Billed |
| Telephone conference with attorney Rick Schell of McAllen Texas discussing his complaint against MHT and commonalities between his case and ours. | | | | | | | | | | | | | | | |
| 01/07/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 210.00 | 300.00 | 0.70 | 210.00 | 300.00 | 10000 | | 809412 | Billed |

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Time Report

Billed and Unbilled

02/27/2018

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|---|---------|--------------------|-------------|---------------|------|----------|-----------|-----------|---------|-----------|----------|---------|----------|---------|--------|
| Telephone conference with attorney Don Massey and Dr Sandy regarding class action lawsuit in Texas. | | | | | | | | | | | | | | | |
| 01/09/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 690.00 | 300.00 | 2.30 | 690.00 | 300.00 | 10000 | | 809412 | Billed |
| Attention to various emails regarding Ascentium and MHT. Telephone conference with Pennsylvania physicians regarding representation, strategy and Pennsylvania attorney to assist. | | | | | | | | | | | | | | | |
| 01/10/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 420.00 | 300.00 | 1.40 | 420.00 | 300.00 | 10000 | | 809412 | Billed |
| Telephone conference with attorney [REDACTED] regarding the MHT lawsuit in Dallas Texas against her client, [REDACTED] Receipt and review of Hidalgo County Texas lawsuit against MHT and other individuals. | | | | | | | | | | | | | | | |
| 01/11/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 120.00 | 300.00 | 0.40 | 120.00 | 300.00 | 10000 | | 809412 | Billed |
| Receipt and review of various emails from Dr Blair and Dr Ureche. | | | | | | | | | | | | | | | |
| 01/11/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 3.10 | 651.00 | 210.00 | 3.10 | 651.00 | 210.00 | 10000 | | 809412 | Billed |
| Detailed review of the files, including the loan and contract documents to [REDACTED] | | | | | | | | | | | | | | | |
| 01/12/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 809412 | Billed |
| Complete initial analysis of our attorney's [REDACTED] | | | | | | | | | | | | | | | |
| 01/12/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.70 | 510.00 | 300.00 | 1.70 | 510.00 | 300.00 | 10000 | | 809412 | Billed |
| Attention to various emails and documents provided for review. | | | | | | | | | | | | | | | |
| 01/14/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 0 | 0.50 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 808412 | Billed |
| [No Charge] Prepare litigation budget (.5) | | | | | | | | | | | | | | | |
| 01/16/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 690.00 | 300.00 | 2.30 | 690.00 | 300.00 | 10000 | | 809412 | Billed |
| Draft email correspondence to all physicians regarding the status of the case. Provide explanations regarding the litigation in Texas, estimated litigation costs, [REDACTED] research memorandum, [REDACTED] and possible outcomes of the litigation and various strategies. | | | | | | | | | | | | | | | |
| 01/17/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.40 | 1,020.00 | 300.00 | 3.40 | 1,020.00 | 300.00 | 10000 | | 809412 | Billed |
| Attend initial meeting with [REDACTED] with Dr [REDACTED]. Discuss MHT facts and circumstances to make complaint. | | | | | | | | | | | | | | | |
| 01/17/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 0.70 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 809412 | Billed |
| [No Charge] Telephone conference with [REDACTED] regarding Houston, TX and general matters about MHT and Ascentium conduct, various theories of liability and Texas cases. | | | | | | | | | | | | | | | |
| 01/17/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.60 | 126.00 | 210.00 | 0.60 | 126.00 | 210.00 | 10000 | | 809412 | Billed |
| Conference with Attorney Morgan to discuss the drafting of our complaint and possible causes of action | | | | | | | | | | | | | | | |
| 01/18/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 809453 | Billed |
| Begin preparation of our case history for use in filing our Complaint | | | | | | | | | | | | | | | |
| 01/18/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.80 | 1,140.00 | 300.00 | 3.80 | 1,140.00 | 300.00 | 10000 | 0 | | Billed |
| Receipt and review of Texas Class Action filing. Discussions with Dr Sandy regarding same. Telephone client conference with Don Massey and Dr Sandy to discuss parameters of engagement should our physicians choose to join the class action suit initially. Receipt of engagement letter and terms. Discussion with Ms Roseman regarding the class action suit and [REDACTED] | | | | | | | | | | | | | | | |
| 01/18/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.80 | 1,140.00 | 300.00 | 3.80 | 1,140.00 | 300.00 | 10000 | | 809453 | Billed |
| [REDACTED] | | | | | | | | | | | | | | | |
| 01/18/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -3.80 | -1,140.00 | 300.00 | -3.80 | -1,140.00 | 300.00 | 10000 | 0 | | Billed |
| 01/19/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.60 | 168.00 | 210.00 | 0.60 | 168.00 | 210.00 | 10000 | | 809453 | Billed |
| Detailed review of the class action complaint and analysis of [REDACTED] | | | | | | | | | | | | | | | |
| 01/19/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 240.00 | 300.00 | 0.80 | 240.00 | 300.00 | 10000 | 0 | | Billed |
| Attention to [REDACTED] and relationship to the Texas Class Action lawsuit [REDACTED] | | | | | | | | | | | | | | | |

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App. No. 047

Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|------------|---------|--------------------|-------------|---------------|------|----------|-----------|-----------|---------|-----------|----------|---------|----------|---------|--------|
| 01/19/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 240.00 | 300.00 | 0.80 | 240.00 | 300.00 | 10000 | | 809453 | Billed |
| 01/19/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -0.80 | -240.00 | 300.00 | -0.80 | -240.00 | 300.00 | 10000 | | 0 | Billed |
| 01/20/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.30 | 63.00 | 210.00 | 0.30 | 63.00 | 210.00 | 10000 | | 809453 | Billed |
| 01/20/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.60 | 126.00 | 210.00 | 0.60 | 126.00 | 210.00 | 10000 | | 809453 | Billed |
| 01/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.80 | 1,140.00 | 300.00 | 3.80 | 1,140.00 | 300.00 | 10000 | | 0 | Billed |
| 01/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.80 | 1,140.00 | 300.00 | 3.80 | 1,140.00 | 300.00 | 10000 | | 809453 | Billed |
| 01/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -3.80 | -1,140.00 | 300.00 | -3.80 | -1,140.00 | 300.00 | 10000 | | 0 | Billed |
| 01/21/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.30 | 63.00 | 210.00 | 0.30 | 63.00 | 210.00 | 10000 | | 809453 | Billed |
| 01/23/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 3.60 | 756.00 | 210.00 | 3.60 | 756.00 | 210.00 | 10000 | | 809453 | Billed |
| 01/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.60 | 480.00 | 300.00 | 1.60 | 480.00 | 300.00 | 10000 | | 0 | Billed |
| 01/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.60 | 400.00 | 250.00 | 1.60 | 400.00 | 250.00 | 10000 | | 809453 | Billed |
| 01/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 809453 | Billed |
| 01/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -1.60 | -480.00 | 300.00 | -1.60 | -480.00 | 300.00 | 10000 | | 0 | Billed |
| 01/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | -2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 0.80 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.20 | 960.00 | 300.00 | 3.20 | 960.00 | 300.00 | 10000 | | 0 | Billed |
| 01/24/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.20 | 252.00 | 210.00 | 1.20 | 252.00 | 210.00 | 10000 | | 809453 | Billed |
| 01/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 0.80 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 809453 | Billed |

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Time Report

Billed and Unbilled

02/27/2018

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|------------|---------|--------------------|-------------|---------------|------|----------|-----------|-----------|---------|-----------|----------|---------|----------|---------|--------|
| 01/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.20 | 800.00 | 250.00 | 3.20 | 800.00 | 250.00 | 10000 | | 809453 | Billed |
| 01/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | -0.80 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -3.20 | -960.00 | 300.00 | -3.20 | -960.00 | 300.00 | 10000 | | 0 | Billed |
| 01/25/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 3.60 | 756.00 | 210.00 | 3.60 | 756.00 | 210.00 | 10000 | | 809453 | Billed |
| 01/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 690.00 | 300.00 | 2.30 | 690.00 | 300.00 | 10000 | | 0 | Billed |
| 01/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 3.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 575.00 | 250.00 | 2.30 | 575.00 | 250.00 | 10000 | | 809453 | Billed |
| 01/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 3.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 809453 | Billed |
| 01/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -2.30 | -690.00 | 300.00 | -2.30 | -690.00 | 300.00 | 10000 | | 0 | Billed |
| 01/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | -3.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/26/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.10 | 231.00 | 210.00 | 1.10 | 231.00 | 210.00 | 10000 | | 809453 | Billed |
| 01/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.70 | 1,110.00 | 300.00 | 3.70 | 1,110.00 | 300.00 | 10000 | | 0 | Billed |
| 01/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.70 | 925.00 | 250.00 | 3.70 | 925.00 | 250.00 | 10000 | | 809453 | Billed |
| 01/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 809453 | Billed |
| 01/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -3.70 | -1,110.00 | 300.00 | -3.70 | -1,110.00 | 300.00 | 10000 | | 0 | Billed |
| 01/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | -2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 0 | Billed |
| 01/30/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.70 | 510.00 | 300.00 | 1.70 | 510.00 | 300.00 | 10000 | | 0 | Billed |
| 01/30/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.70 | 425.00 | 250.00 | 1.70 | 425.00 | 250.00 | 10000 | | 809453 | Billed |
| 01/30/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -1.70 | -510.00 | 300.00 | -1.70 | -510.00 | 300.00 | 10000 | | 0 | Billed |

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Time Report

Billed and Unbilled

02/27/2018

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|------------|---------|-------------------------|-------------|---|------|----------|----------|-----------|---------|----------|----------|---------|----------|---------|--------|
| 01/31/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 210.00 | 300.00 | 0.70 | 210.00 | 300.00 | 10000 | 0 | | Billed |
| | | | | Address issues in telephone conferences. Schedule telephone conference for Thursday. Telephone discussion with [REDACTED] | | | | | | | | | | | |
| 01/31/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.50 | 315.00 | 210.00 | 1.50 | 315.00 | 210.00 | 10000 | 809453 | | Billed |
| | | | | Draft our Complaint, including factual allegations, jurisdictional allegations, and [REDACTED] | | | | | | | | | | | |
| 01/31/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 175.00 | 250.00 | 0.70 | 175.00 | 250.00 | 10000 | 809453 | | Billed |
| | | | | [REDACTED] | | | | | | | | | | | |
| 01/31/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | -0.70 | -210.00 | 300.00 | -0.70 | -210.00 | 300.00 | 10000 | 0 | | Billed |
| | | | | [REDACTED] | | | | | | | | | | | |
| 02/01/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.40 | 504.00 | 210.00 | 2.40 | 504.00 | 210.00 | 10000 | 811776 | | Billed |
| | | | | Prepare our complaint and demand for relief | | | | | | | | | | | |
| 02/01/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | 811776 | | Billed |
| | | | | Telephone call with [REDACTED] regarding interviews with [REDACTED] | | | | | | | | | | | |
| 02/01/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.70 | 1,425.00 | 250.00 | 5.70 | 1,425.00 | 250.00 | 10000 | 811776 | | Billed |
| | | | | Continue drafting and writing fact based section of the Complaint. | | | | | | | | | | | |
| 02/02/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.20 | 1,300.00 | 250.00 | 5.20 | 1,300.00 | 250.00 | 10000 | 811776 | | Billed |
| | | | | Telephone conference with [REDACTED] Request telephone numbers for contact and scheduling times to meet [REDACTED] | | | | | | | | | | | |
| 02/02/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | 811776 | | Billed |
| | | | | Telephone conference with [REDACTED] Ms Roseman and Dr Bhainagar. | | | | | | | | | | | |
| 02/02/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 5.90 | 1,239.00 | 210.00 | 5.90 | 1,239.00 | 210.00 | 10000 | 811776 | | Billed |
| | | | | Continued preparation of our complaint and review of legal authority regarding [REDACTED] | | | | | | | | | | | |
| 02/03/2017 | 1125 | Studzinski, Stephanie L | 45 | Paralegal | 1 | 2.10 | 315.00 | 150.00 | 2.10 | 315.00 | 150.00 | 10000 | 811776 | | Billed |
| | | | | [REDACTED] | | | | | | | | | | | |
| 02/03/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 3.40 | 714.00 | 210.00 | 3.40 | 714.00 | 210.00 | 10000 | 811776 | | Billed |
| | | | | Continued preparation of our complaint and research regarding additional causes of action; correspondence with the group regarding the same and discussing the option of [REDACTED] | | | | | | | | | | | |
| 02/03/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 6.70 | 1,675.00 | 250.00 | 6.70 | 1,675.00 | 250.00 | 10000 | 811776 | | Billed |
| | | | | Finalize complaint and prepare all documents for submission. Email draft with correspondence to each physician to review and comment on the complaint. | | | | | | | | | | | |
| 02/06/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.80 | 168.00 | 210.00 | 0.80 | 168.00 | 210.00 | 10000 | 811776 | | Billed |
| | | | | Finalize our Complaint and prepare it for filing | | | | | | | | | | | |
| 02/06/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.80 | 700.00 | 250.00 | 2.80 | 700.00 | 250.00 | 10000 | 811776 | | Billed |
| | | | | Finalize complaint and exhibits for filing. Sign complaint and file. | | | | | | | | | | | |
| 02/07/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.70 | 567.00 | 210.00 | 2.70 | 567.00 | 210.00 | 10000 | 811776 | | Billed |
| | | | | [REDACTED] | | | | | | | | | | | |
| 02/08/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | 811776 | | Billed |
| | | | | Receipt and review of Age Management's timeline of contacts with Defendants | | | | | | | | | | | |
| 02/08/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 175.00 | 250.00 | 0.70 | 175.00 | 250.00 | 10000 | 811776 | | Billed |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|---|---------|--------------------|-------------|---------------|------|----------|----------|-----------|---------|---------|----------|---------|----------|---------|--------|
| Receipt and review of Bhatnagar timeline. | | | | | | | | | | | | | | | |
| 02/08/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.00 | 420.00 | 210.00 | 2.00 | 420.00 | 210.00 | 10000 | | 811776 | Billed |
| Telephone conference with Dr. Bhatnagar, [REDACTED] and Attorney Morgan regarding possible consultation on the case and the progress of the case | | | | | | | | | | | | | | | |
| 02/09/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 100.00 | 250.00 | 0.40 | 100.00 | 250.00 | 10000 | | 811776 | Billed |
| Contact with [REDACTED] and forward documents [REDACTED] | | | | | | | | | | | | | | | |
| 02/09/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.80 | 950.00 | 250.00 | 3.80 | 950.00 | 250.00 | 10000 | | 811776 | Billed |
| Telephone conference with [REDACTED] and Dr. Bhatnagar. Continue conversation with Dr. Bhatnagar. | | | | | | | | | | | | | | | |
| 02/10/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.50 | 875.00 | 250.00 | 3.50 | 875.00 | 250.00 | 10000 | | 811776 | Billed |
| Meet with [REDACTED] | | | | | | | | | | | | | | | |
| 02/15/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 811776 | Billed |
| Attention to emails, review of documents and forward to [REDACTED] | | | | | | | | | | | | | | | |
| 02/16/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 811776 | Billed |
| Begin preparation of updated litigation budget and memorandum regarding the same | | | | | | | | | | | | | | | |
| 02/17/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.30 | 273.00 | 210.00 | 1.30 | 273.00 | 210.00 | 10000 | | 811776 | Billed |
| Telephone call with counsel for Univest to discuss the case | | | | | | | | | | | | | | | |
| 02/17/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 811776 | Billed |
| Telephone conference with [REDACTED] attorney representing [REDACTED] regarding status of the case, possible settlement and extension to answer. | | | | | | | | | | | | | | | |
| 02/20/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.80 | 168.00 | 210.00 | 0.80 | 168.00 | 210.00 | 10000 | | 811776 | Billed |
| Prepare updated litigation budget; prepare memorandum detailing the life of a lawsuit in preparation for meeting with the group | | | | | | | | | | | | | | | |
| 02/21/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.00 | 750.00 | 250.00 | 3.00 | 750.00 | 250.00 | 10000 | | 811776 | Billed |
| Meet with Dr. Blair and [REDACTED] | | | | | | | | | | | | | | | |
| 02/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.30 | 75.00 | 250.00 | 0.30 | 75.00 | 250.00 | 10000 | | 811776 | Billed |
| Receipt and review of two emails from Dr Ho pertaining to Ascentium. | | | | | | | | | | | | | | | |
| 03/02/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.80 | 450.00 | 250.00 | 1.80 | 450.00 | 250.00 | 10000 | | 811776 | Billed |
| Meet with Dr Ureche and [REDACTED] | | | | | | | | | | | | | | | |
| 03/07/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.50 | 105.00 | 210.00 | 0.50 | 105.00 | 210.00 | 10000 | | 811776 | Billed |
| Telephone calls with counsel for Ascentium and McKenzie and potential counsel for MHT | | | | | | | | | | | | | | | |
| 03/07/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 811776 | Billed |
| Telephone conference with Ascentium's Michigan attorney, request for extension and general thoughts about this dispute and how to resolve, if possible. | | | | | | | | | | | | | | | |
| 03/08/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 811776 | Billed |
| Receipt and review of Massey TRO motion and declarations. | | | | | | | | | | | | | | | |
| 03/09/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 811776 | Billed |
| Preparation for telephone conference with attorney Massey regarding TRO and new declarations. | | | | | | | | | | | | | | | |
| 03/09/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 100.00 | 250.00 | 0.40 | 100.00 | 250.00 | 10000 | | 811776 | Billed |
| Telephone conference with Andrew Portinga regarding Wartzberger representation and request for extension. | | | | | | | | | | | | | | | |
| 03/21/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.60 | 400.00 | 250.00 | 1.60 | 400.00 | 250.00 | 10000 | | 811776 | Billed |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|--|---------|--------------------|-------------|---------------|------|----------|----------|-----------|---------|---------|----------|---------|----------|---------|--------|
| Review Michigan case law regarding [REDACTED] Email correspondence with attorney Massey regarding complaint. | | | | | | | | | | | | | | | |
| 03/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.50 | 375.00 | 250.00 | 1.50 | 375.00 | 250.00 | 10000 | | 811776 | Billed |
| Review of various declarations and articles regarding MHT suits provided by Dr Sandy. Email correspondence with Dr Sandy. | | | | | | | | | | | | | | | |
| 03/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 100.00 | 250.00 | 0.40 | 100.00 | 250.00 | 10000 | | 811776 | Billed |
| Email correspondence to attorney Clements regarding new Univest demand letter and question the amount of time provided. | | | | | | | | | | | | | | | |
| 03/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.70 | 925.00 | 250.00 | 3.70 | 925.00 | 250.00 | 10000 | | 811776 | Billed |
| [REDACTED] | | | | | | | | | | | | | | | |
| 03/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 811776 | Billed |
| Forward all recent recording documents to [REDACTED] Email correspondence regarding same. | | | | | | | | | | | | | | | |
| 03/24/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.70 | 147.00 | 210.00 | 0.70 | 147.00 | 210.00 | 10000 | | 811776 | Billed |
| Call with counsel for Debra Wertzberger to discuss her status as a defendant; conference with Mr. Morgan regarding strategy as to the same | | | | | | | | | | | | | | | |
| 03/27/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 811776 | Billed |
| Review Texas MHY pleadings provided by attorney Cole. Telephone conference with attorney Cole and Dr. Sandy. | | | | | | | | | | | | | | | |
| 03/28/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 811776 | Billed |
| Attend to MHT and individual defendant requests for extension. Telephone conference with MHT attorney regarding reasons for request. Grant request. Telephone conference with Dr Sandy regarding request and reasoning behind grant. | | | | | | | | | | | | | | | |
| 03/28/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.60 | 126.00 | 210.00 | 0.60 | 126.00 | 210.00 | 10000 | | 811776 | Billed |
| Telephone calls with counsel for Debra Wertzberger and Texas counsel for MHT | | | | | | | | | | | | | | | |
| 03/29/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.20 | 800.00 | 250.00 | 3.20 | 800.00 | 250.00 | 10000 | | 811776 | Billed |
| Receipt and review of Univest Complaint against Dr. Blair. Review of docket and list of 26 complaints filed. Telephone conference with Drs. Blair and Sandy to discuss impact and services of complaint should it be requested. | | | | | | | | | | | | | | | |
| 03/29/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 811776 | Billed |
| Conference with Mr. Morgan to discuss Complaint filed by Univest in Pennsylvania | | | | | | | | | | | | | | | |
| 04/02/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 813386 | Billed |
| Review Massey Univest Complaint and Declarations. Communication with Dr. Blair. Telephone conference with Dr. Sandy regarding possible MHT bankruptcy and impact on case. | | | | | | | | | | | | | | | |
| 04/07/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.50 | 105.00 | 210.00 | 0.50 | 105.00 | 210.00 | 10000 | | 813386 | Billed |
| Telephone call with counsel for Ms. Wertzberger to discuss possible dismissal of her | | | | | | | | | | | | | | | |
| 04/07/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.30 | 63.00 | 210.00 | 0.30 | 63.00 | 210.00 | 10000 | | 813386 | Billed |
| Receipt and review of Univest's Motion to Dismiss | | | | | | | | | | | | | | | |
| 04/11/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 813386 | Billed |
| Correspondence with counsel for Ms. Wertzberger regarding her request to be dismissed | | | | | | | | | | | | | | | |
| 04/11/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.70 | 925.00 | 250.00 | 3.70 | 925.00 | 250.00 | 10000 | | 813386 | Billed |
| Telephone conferences with Dr Blair and email communication with attorney Stallings regarding Univest representation and Dr. Blair service. Review Univest motion for summary disposition and brief. Forward complaint and Univest motion to attorney Stallings. | | | | | | | | | | | | | | | |
| 04/12/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | | 813386 | Billed |
| Telephone call from Ms. Vujec advising that she has an affidavit prepared for Ms. Wertzberger to sign and requesting our review of it prior to execution | | | | | | | | | | | | | | | |
| 04/12/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.70 | 147.00 | 210.00 | 0.70 | 147.00 | 210.00 | 10000 | | 813386 | Billed |
| Detailed review of the affidavit of Debra Wertzberger; conference with Mr. Morgan to discuss the same | | | | | | | | | | | | | | | |
| 04/12/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.40 | 600.00 | 250.00 | 2.40 | 600.00 | 250.00 | 10000 | | 813386 | Billed |

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Time Report

Billed and Unbilled

02/27/2018

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

| Date | SM Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|---|---------|--------------------|-------------|---------------|------|----------|----------|-----------|---------|----------|----------|---------|----------|---------|--------|
| Attention to defaults of Defendants Ho, Leire and Frank. Address answers filed by MHT and Postle. | | | | | | | | | | | | | | | |
| 04/13/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/13/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.50 | 105.00 | 210.00 | 0.50 | 105.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/13/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.30 | 75.00 | 250.00 | 0.30 | 75.00 | 250.00 | 10000 | | 813386 | Billed |
| 04/13/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.30 | 75.00 | 250.00 | 0.30 | 75.00 | 250.00 | 10000 | | 813386 | Billed |
| 04/17/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/17/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/17/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/18/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.30 | 483.00 | 210.00 | 2.30 | 483.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/18/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.40 | 84.00 | 210.00 | 0.40 | 84.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/19/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.70 | 357.00 | 210.00 | 1.70 | 357.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/20/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/20/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 6.30 | 1,575.00 | 250.00 | 6.30 | 1,575.00 | 250.00 | 10000 | | 813386 | Billed |
| 04/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.90 | 1,475.00 | 250.00 | 5.90 | 1,475.00 | 250.00 | 10000 | | 813386 | Billed |
| 04/21/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.90 | 1,475.00 | 250.00 | 5.90 | 1,475.00 | 250.00 | 10000 | | 813386 | Billed |
| 04/24/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.10 | 441.00 | 210.00 | 2.10 | 441.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.20 | 800.00 | 250.00 | 3.20 | 800.00 | 250.00 | 10000 | | 813386 | Billed |
| 04/25/2017 | 2174 | Morley, Daniel M | 10 | Shareholder | 1 | 0.40 | 110.00 | 275.00 | 0.40 | 110.00 | 275.00 | 10000 | | 813386 | Billed |
| 04/25/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.50 | 315.00 | 210.00 | 1.50 | 315.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.70 | 675.00 | 250.00 | 2.70 | 675.00 | 250.00 | 10000 | | 813386 | Billed |
| 04/27/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.50 | 105.00 | 210.00 | 0.50 | 105.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/28/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.60 | 126.00 | 210.00 | 0.60 | 126.00 | 210.00 | 10000 | | 813386 | Billed |
| 04/30/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.60 | 126.00 | 210.00 | 0.60 | 126.00 | 210.00 | 10000 | | 813386 | Billed |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|--|---------|--------------------|-------------|---------------|------|----------|----------|-----------|---------|----------|----------|---------|----------|---------|--------|
| Continued preparation of our response to Univest's motion to dismiss | | | | | | | | | | | | | | | |
| 05/01/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 814975 | Billed |
| Telephone conferences with Dr Sandy and attorney Marks. Forward requested documentation to attorney Marks for review and commentary. | | | | | | | | | | | | | | | |
| 05/02/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.30 | 63.00 | 210.00 | 0.30 | 63.00 | 210.00 | 10000 | | 814975 | Billed |
| 05/02/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.60 | 525.00 | 210.00 | 2.50 | 525.00 | 210.00 | 10000 | | 814975 | Billed |
| Preparation of our response to Univest's motion for summary disposition | | | | | | | | | | | | | | | |
| 05/02/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.60 | 650.00 | 250.00 | 2.60 | 650.00 | 250.00 | 10000 | | 814975 | Billed |
| Review commentary provide by attorney Marks | | | | | | | | | | | | | | | |
| 05/03/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.00 | 210.00 | 210.00 | 1.00 | 210.00 | 210.00 | 10000 | | 814975 | Billed |
| Continued research and preparation of our response to Univest's Motion for Summary Disposition | | | | | | | | | | | | | | | |
| 05/03/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.80 | 1,200.00 | 250.00 | 4.80 | 1,200.00 | 250.00 | 10000 | | 814975 | Billed |
| Draft Blair Affidavit for attachment objections to Response Brief. Make suggested revisions to the Response Brief. Communication with attorney [REDACTED] in Texas representing [REDACTED] | | | | | | | | | | | | | | | |
| 05/04/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 3.00 | 630.00 | 210.00 | 3.00 | 630.00 | 210.00 | 10000 | | 814975 | Billed |
| Continued preparation of our Response to Univest's Motion for Summary Disposition | | | | | | | | | | | | | | | |
| 05/04/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 7.20 | 1,800.00 | 250.00 | 7.20 | 1,800.00 | 250.00 | 10000 | | 814975 | Billed |
| Finalize brief. | | | | | | | | | | | | | | | |
| 05/05/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.30 | 1,075.00 | 250.00 | 4.30 | 1,075.00 | 250.00 | 10000 | | 814975 | Billed |
| Final review of response brief. Final review of all exhibits. Determine brief ready for filing and file with Court. | | | | | | | | | | | | | | | |
| 05/09/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.70 | 147.00 | 210.00 | 0.70 | 147.00 | 210.00 | 10000 | | 814975 | Billed |
| Meeting with Attorney Morgan to discuss strategy regarding Dr. Ho and Mr. Fronk and relating to the upcoming hearing on Univest's motion for summary disposition | | | | | | | | | | | | | | | |
| 05/10/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.50 | 125.00 | 250.00 | 0.50 | 125.00 | 250.00 | 10000 | | 814975 | Billed |
| Attention to setting up litigation alerts for Univest, Ascentium and Balboa with Westlaw. | | | | | | | | | | | | | | | |
| 05/11/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.50 | 525.00 | 210.00 | 2.50 | 525.00 | 210.00 | 10000 | | 814975 | Billed |
| Plan and prepare for hearing on Univest's motion for summary disposition | | | | | | | | | | | | | | | |
| 05/11/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.70 | 675.00 | 250.00 | 2.70 | 675.00 | 250.00 | 10000 | | 814975 | Billed |
| Review Dr. Grillo materials. | | | | | | | | | | | | | | | |
| 05/12/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 2.70 | 567.00 | 210.00 | 2.70 | 567.00 | 210.00 | 10000 | | 814975 | Billed |
| Preparation for and attendance at hearing on Univest's Motion for Summary Disposition; meeting with Dr. Blair regarding the same | | | | | | | | | | | | | | | |
| 05/12/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 0 | 2.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 814975 | Billed |
| [No Charge] Attend motion hearing with Dr. Blair and Ms Roseman. | | | | | | | | | | | | | | | |
| 05/12/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.80 | 450.00 | 250.00 | 1.80 | 450.00 | 250.00 | 10000 | | 814975 | Billed |
| Meeting with Dr. Blair prior to hearing and post hearing to discuss court ruling and further steps to take. | | | | | | | | | | | | | | | |
| 05/14/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 814975 | Billed |
| Telephone conference with attorney Massey regarding the Univest motion, Texas Federal Court up-date and [REDACTED] | | | | | | | | | | | | | | | |
| 05/15/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 814975 | Billed |

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Time Report

Billed and Unbilled

02/27/2018

Solarawicz, Maciej MD / Dr. Solarawicz, Dr. Starr et al re: Phys (87267-202838)

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|------------|---------|-----------------------|-------------|--|------|----------|----------|-----------|---------|---------|----------|---------|----------|---------|--------|
| 05/16/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 100.00 | 250.00 | 0.40 | 100.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Receipt and review of MHT bankruptcy filing. Forward to Dr. Sandy for review. | | | | | | | | | | | |
| 05/16/2017 | 2174 | Morley, Daniel M | 10 | Shareholder | 1 | 0.30 | 82.50 | 275.00 | 0.30 | 82.50 | 275.00 | 10000 | | 814975 | Billed |
| | | | | Conference with Atty K. Morgan regarding bankruptcy issues | | | | | | | | | | | |
| 05/17/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.80 | 168.00 | 210.00 | 0.80 | 168.00 | 210.00 | 10000 | | 814975 | Billed |
| | | | | Attention to strategy with Mr. Morgan and Ms. Gordon regarding our amended complaint and | | | | | | | | | | | |
| 05/17/2017 | 2348 | Gordon, Debani T. | 35 | Law Clerk | 0 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 814975 | Billed |
| | | | | [No Charge] Meeting regarding doctors Cese, overview, and preparation with primary attorneys. | | | | | | | | | | | |
| 05/17/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Review Balboa complaints and two South Carolina Federal cases filed against MHT and Ascendum. | | | | | | | | | | | |
| 05/18/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.90 | 225.00 | 250.00 | 0.90 | 225.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Attention to requests for information from attorney De Leon, correspondence with attorney Marks, and review Balboa complaint in Orange County. | | | | | | | | | | | |
| 05/19/2017 | 2348 | Gordon, Debani T. | 35 | Law Clerk | 0 | 1.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 814975 | Billed |
| | | | | [No Charge] Complaint overview and case background research for legal analysis of | | | | | | | | | | | |
| 05/19/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.00 | 250.00 | 250.00 | 1.00 | 250.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Telephone conference with [redacted] Kirk default and willingness for them to speak and provide documentation. | | | | | | | | | | | |
| 05/22/2017 | 2201 | Schucknecht, Ronald A | 10 | Shareholder | 1 | 0.70 | 210.00 | 300.00 | 0.70 | 210.00 | 300.00 | 10000 | | 814975 | Billed |
| | | | | Telephone conference with Kirk about bankruptcy issues related to MHT filing a 7, review the Notice of Bankruptcy Filing in MHT's bankruptcy case, e-mail a copy of the Notice to Kirk | | | | | | | | | | | |
| 05/22/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 100.00 | 250.00 | 0.40 | 100.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Discussion with attorney Schucknecht regarding bankruptcy automatic stay, lifting and effect on current litigation and defendants in circuit court action. | | | | | | | | | | | |
| 05/22/2017 | 2348 | Gordon, Debani T. | 35 | Law Clerk | 0 | 7.50 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 814975 | Billed |
| | | | | [No Charge] Detailed Memorandum detailing [redacted] | | | | | | | | | | | |
| 05/22/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 575.00 | 250.00 | 2.30 | 575.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Commence research and review of Michigan case law pertaining to [redacted] | | | | | | | | | | | |
| 05/23/2017 | 2348 | Gordon, Debani T. | 35 | Law Clerk | 0 | 4.20 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 814975 | Billed |
| | | | | [No Charge] [redacted] | | | | | | | | | | | |
| 05/23/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 575.00 | 250.00 | 2.30 | 575.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Telephone conference with plaintiff's attorneys regarding MHT bankruptcy and strategies for dealing with same. | | | | | | | | | | | |
| 05/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 814975 | Billed |
| | | | | Telephone conference with attorneys Campbell and Allen regarding [redacted] | | | | | | | | | | | |
| 05/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 370.50 | 285.00 | 10000 | | 816878 | Billed |
| | | | | Telephone conference with attorney Massey regarding the [redacted] | | | | | | | | | | | |
| 05/30/2017 | 2201 | Schucknecht, Ronald A | 10 | Shareholder | 1 | 0.30 | 90.00 | 300.00 | 0.30 | 90.00 | 300.00 | 10000 | | 814975 | Billed |
| | | | | Telephone call with Kirk about the some bankruptcy issues, review and reply to an e-mail from Kirk about the same | | | | | | | | | | | |

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Billed and Unbilled

02/27/2018

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|------------|---------|--|-------------|---------------|------|----------|----------|-----------|---------|---------|----------|---------|----------|---------|--------|
| 05/30/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.50 | 315.00 | 210.00 | 1.50 | 315.00 | 210.00 | 10000 | | 814975 | Billed |
| | | Begin review of legal authority regarding [REDACTED] | | | | | | | | | | | | | |
| 05/30/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.80 | 450.00 | 250.00 | 1.80 | 450.00 | 250.00 | 10000 | | 814875 | Billed |
| | | Bankruptcy phone conference with attorneys Allen, Campbell, Silinski, De Leon and Cole. Follow-up conversation with Dr. Sandy regarding strategies to deal with the automatic stay of MHT. | | | | | | | | | | | | | |
| 05/30/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.60 | 150.00 | 250.00 | 0.60 | 150.00 | 250.00 | 10000 | | 814975 | Billed |
| | | Telephone conference with Mr. Schucknecht regarding bankruptcy issues effecting the litigation. | | | | | | | | | | | | | |
| 05/30/2017 | 2348 | Gordon, Debanl T. | 35 | Law Clerk | 0 | 6.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 814975 | Billed |
| | | [REDACTED] | | | | | | | | | | | | | |
| 05/31/2017 | 2201 | Schucknecht, Ronald A | 10 | Shareholder | 1 | 1.30 | 390.00 | 300.00 | 1.30 | 390.00 | 300.00 | 10000 | | 814975 | Billed |
| | | Review the Adversary Complaint filed in Texas Bankruptcy Court by Dr. Johnston, review 28 USC 157, and review the suggestion of bankruptcy filed in PA Federal District Court in the case of Unvest Capital Inc. | | | | | | | | | | | | | |
| 05/31/2017 | 2201 | Schucknecht, Ronald A | 10 | Shareholder | 1 | 0.70 | 210.00 | 300.00 | 0.70 | 210.00 | 300.00 | 10000 | | 814975 | Billed |
| | | Telephone conference with Kirk Morgan about bankruptcy issues | | | | | | | | | | | | | |
| 05/31/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.20 | 252.00 | 210.00 | 1.20 | 252.00 | 210.00 | 10000 | | 814975 | Billed |
| | | Continued review of legal authority regarding [REDACTED] | | | | | | | | | | | | | |
| 05/31/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | | 814975 | Billed |
| | | Conference with Attorney Morgan regarding the automatic bankruptcy stay; telephone call and message left with the Court regarding the same | | | | | | | | | | | | | |
| 05/31/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.90 | 225.00 | 250.00 | 0.90 | 225.00 | 250.00 | 10000 | | 814975 | Billed |
| | | Telephone conferences with Ms Haidery regarding MHT bankruptcy and with Mr De Leon regarding bankruptcy | | | | | | | | | | | | | |
| 05/31/2017 | 2348 | Gordon, Debanl T. | 35 | Law Clerk | 0 | 6.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 814975 | Billed |
| | | [REDACTED] | | | | | | | | | | | | | |
| 06/02/2017 | 2348 | Gordon, Debanl T. | 35 | Law Clerk | 0 | 5.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 816876 | Billed |
| | | [No Charge] Received instruction from attorney [REDACTED] | | | | | | | | | | | | | |
| 06/02/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 1.80 | 378.00 | 210.00 | 1.80 | 378.00 | 210.00 | 10000 | | 816876 | Billed |
| | | Begin preparation of our first amended complaint | | | | | | | | | | | | | |
| 06/05/2017 | 2348 | Gordon, Debanl T. | 35 | Law Clerk | 0 | 7.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 816876 | Billed |
| | | [No Charge] Structural revisions to A [REDACTED] | | | | | | | | | | | | | |
| 06/05/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.70 | 147.00 | 210.00 | 0.70 | 147.00 | 210.00 | 10000 | | 816876 | Billed |
| | | Conference call with the Court to discuss staying the case given the bankruptcy filing by MHT | | | | | | | | | | | | | |
| 06/06/2017 | 2348 | Gordon, Debanl T. | 35 | Law Clerk | 0 | 5.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 10000 | | 816876 | Billed |
| | | [REDACTED] | | | | | | | | | | | | | |
| 06/19/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 816876 | Billed |
| | | Telephone conference and interview with attorney Michael McBride for retention as bankruptcy attorney in Texas | | | | | | | | | | | | | |
| 06/22/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.10 | 275.00 | 250.00 | 1.10 | 275.00 | 250.00 | 10000 | | 816876 | Billed |
| | | Telephone conference with Don Massey regarding settlement discussions [REDACTED] | | | | | | | | | | | | | |
| 07/03/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.60 | 150.00 | 250.00 | 0.60 | 150.00 | 250.00 | 10000 | | 818489 | Billed |
| | | Telephone conference with Mr. McBride regarding bankruptcy stay and client retention. | | | | | | | | | | | | | |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|--|---------|----------------|-------------|---------------|------|----------|----------|-----------|---------|---------|----------|---------|----------|---------|--------|
| 07/06/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.50 | 375.00 | 250.00 | 1.50 | 375.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with Mike McBride regarding positioning of bankruptcy matter. Develop a list of possible course of action to take to provide to physicians. [REDACTED] | | | | | | | | | | | | | | | |
| 07/07/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 575.00 | 250.00 | 2.30 | 575.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with Matt Stammel, counsel for Ascendum regarding settlement and possible manner to resolve this issue. Telephone conference with Eric Sandy regarding recent conferences with attorneys Stammel and McBride. Telephone conference with attorney McBride regarding further bankruptcy strategies. | | | | | | | | | | | | | | | |
| 07/10/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with Don Massey regarding settlement discussions with Ascendum and up-coming mediation. | | | | | | | | | | | | | | | |
| 07/11/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.30 | 75.00 | 250.00 | 0.30 | 75.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with attorney McBride regarding retainer amount and strategy in bankruptcy court. | | | | | | | | | | | | | | | |
| 07/11/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with attorney McBride to discuss retention amount, engagement letter, possible strategies to lift the automatic stay and questions for up-coming 341 hearing. | | | | | | | | | | | | | | | |
| 07/12/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 818489 | Billed |
| Receipt and response to various email communications from attorney McBride regarding engagement, retention amount and attendance at the 341 hearing. | | | | | | | | | | | | | | | |
| 07/13/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.60 | 900.00 | 250.00 | 3.60 | 900.00 | 250.00 | 10000 | | 818489 | Billed |
| Attention to various emails from attorney McBride. Draft and forward lines of questions for Postle at MHT 341 Bankruptcy hearing. Telephone conference with attorneys Haldery, Twill and De Leon regarding strategies for dealing [REDACTED] | | | | | | | | | | | | | | | |
| 07/14/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.50 | 375.00 | 250.00 | 1.50 | 375.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with attorney McBride regarding the outcome of questioning at the MHT 341 Bankruptcy hearing. | | | | | | | | | | | | | | | |
| 07/14/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 818489 | Billed |
| Provide lines of questioning for attorney McBride to follow at the MHT 341 Bankruptcy hearing. | | | | | | | | | | | | | | | |
| 07/17/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.10 | 525.00 | 250.00 | 2.10 | 525.00 | 250.00 | 10000 | | 818489 | Billed |
| Preparation for telephone conference with attorney Massey regarding 341 hearing and framework for possible settlement of matter. Attend telephone conference. | | | | | | | | | | | | | | | |
| 07/18/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.70 | 675.00 | 250.00 | 2.70 | 675.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with Trustee attorney Levick, attorney McBride and attorney Massey. Follow-up phone conference with attorney McBride regarding stipulation/consent to continue discovery in the Bankruptcy Court. | | | | | | | | | | | | | | | |
| 07/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with Mr. Massey regarding [REDACTED] | | | | | | | | | | | | | | | |
| 07/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.50 | 625.00 | 250.00 | 2.50 | 625.00 | 250.00 | 10000 | | 818489 | Billed |
| Write initial version of the declaration of [REDACTED] | | | | | | | | | | | | | | | |
| 07/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.50 | 625.00 | 250.00 | 2.50 | 625.00 | 250.00 | 10000 | | 818489 | Billed |
| Follow-up telephone conference with Dr. Sandy to further [REDACTED] | | | | | | | | | | | | | | | |
| 07/28/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.80 | 450.00 | 250.00 | 1.80 | 450.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with attorney Massey regarding framework for possible settlement, bankruptcy issue and other lenders. | | | | | | | | | | | | | | | |
| 07/28/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.50 | 125.00 | 250.00 | 0.50 | 125.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with Dr. Blair regarding case status and Postle's testimony regarding [REDACTED] | | | | | | | | | | | | | | | |
| 07/28/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.50 | 125.00 | 250.00 | 0.50 | 125.00 | 250.00 | 10000 | | 818489 | Billed |
| Telephone conference with Dr. Sandy regarding conversations with attorney Massey. | | | | | | | | | | | | | | | |
| 08/04/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 820081 | Billed |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|--|---------|--------------------|-------------|---------------|------|----------|----------|-----------|---------|----------|----------|---------|----------|---------|--------|
| Continued attention to drafting amended complaint. | | | | | | | | | | | | | | | |
| 08/07/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.30 | 825.00 | 250.00 | 3.30 | 825.00 | 250.00 | 10000 | | 820081 | Billed |
| Meeting with attorney Massey to discuss possible settlement of Ascentium loan IPAs. | | | | | | | | | | | | | | | |
| 08/08/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.20 | 800.00 | 250.00 | 3.20 | 800.00 | 250.00 | 10000 | | 820081 | Billed |
| Telephone conferences with attorney McBride regarding Bankruptcy Court hearing. Discuss possible strategies for [REDACTED] | | | | | | | | | | | | | | | |
| 08/09/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 820081 | Billed |
| Telephone conference with Mr. McBride regarding [REDACTED] | | | | | | | | | | | | | | | |
| 08/10/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 820081 | Billed |
| Attend pre-trial conference by phone. | | | | | | | | | | | | | | | |
| 08/14/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 820081 | Billed |
| Telephone conference with attorney Massey regarding Ascentium and possible settlement framework. | | | | | | | | | | | | | | | |
| 08/16/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 820081 | Billed |
| Telephone conference with Dr. Lazaro regarding bankruptcy attorney involvement. Telephone conferences with attorney McBride regarding [REDACTED] and resolution of MHT's continued naming in the lawsuit. | | | | | | | | | | | | | | | |
| 08/17/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 575.00 | 250.00 | 2.30 | 575.00 | 250.00 | 10000 | | 820081 | Billed |
| Prepare physician/guarantor list for attorney Massey. Telephone conferences with attorney Massey and Dr. Bhatnagar. | | | | | | | | | | | | | | | |
| 08/18/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.20 | 1,300.00 | 250.00 | 5.20 | 1,300.00 | 250.00 | 10000 | | 820081 | Billed |
| Review and revise the draft motion to lift stay. Forward redline revisions to attorney McBride. Revise and redline modifications to the proposed attorney affidavit to Ms. Brooks. | | | | | | | | | | | | | | | |
| 08/21/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 7.30 | 1,825.00 | 250.00 | 7.30 | 1,825.00 | 250.00 | 10000 | | 820081 | Billed |
| Receipt and review of proposed settlement framework from attorney Massey. Forward to Dr. Sandy for review and comment. Discussion with Dr. Sandy regarding same. Write and forward email to attorney Massey regarding questions and time to discuss. | | | | | | | | | | | | | | | |
| 08/22/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.20 | 1,050.00 | 250.00 | 4.20 | 1,050.00 | 250.00 | 10000 | | 820081 | Billed |
| Telephone conference with Jeff Pastorek of Don Massey's office regarding [REDACTED] | | | | | | | | | | | | | | | |
| 08/31/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.70 | 425.00 | 250.00 | 1.70 | 425.00 | 250.00 | 10000 | | 820081 | Billed |
| Telephone conference with attorney Massey regarding Ascentium and settlement negotiations. Status up-date regarding other physician groups and proposed revisions [REDACTED] Telephone conference with Doctor Sandy regarding same. | | | | | | | | | | | | | | | |
| 09/05/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.50 | 375.00 | 250.00 | 1.50 | 375.00 | 250.00 | 10000 | | 823726 | Billed |
| Discussions with Dr. Sandy and emails to attorney McBride regarding Trustee Motion to bill [REDACTED] | | | | | | | | | | | | | | | |
| 09/07/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.10 | 21.00 | 210.00 | 0.10 | 21.00 | 210.00 | 10000 | | 823726 | Billed |
| Receipt and review of the motion to Enter Into Billing Arrangement and accompanying order regarding the same | | | | | | | | | | | | | | | |
| 09/07/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.10 | 775.00 | 250.00 | 3.10 | 775.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of bankruptcy documents objecting to motion to lift stay. Email communications with attorney McBride, Dr. Sandy and attorney Massey regarding District court extension to file proposed settlement. | | | | | | | | | | | | | | | |
| 09/08/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.20 | 42.00 | 210.00 | 0.20 | 42.00 | 210.00 | 10000 | | 823726 | Billed |
| Detailed review and analysis of the Pennsylvania court's opinion and order transferring the Pennsylvania cases to Texas | | | | | | | | | | | | | | | |
| 09/08/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.80 | 450.00 | 250.00 | 1.80 | 450.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of Pennsylvania District Court order removing Unvest matters to Northern District of Texas. Forward to all physicians for review. Email communications with attorney Massey and McBride regarding phone conference and bankruptcy issues. | | | | | | | | | | | | | | | |
| 09/11/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conference with attorney McBride regarding bankruptcy issues. | | | | | | | | | | | | | | | |
| 09/11/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.10 | 525.00 | 250.00 | 2.10 | 525.00 | 250.00 | 10000 | | 823726 | Billed |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|---|---------|--------------------|-------------|---------------|------|----------|----------|-----------|---------|----------|----------|---------|----------|---------|--------|
| Receipt and review of motion to abstain in Balboa matter in the bankruptcy court. Forward to Dr. Sandy for review and analyze attorney McBride's summary of bankruptcy issues. | | | | | | | | | | | | | | | |
| 09/12/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conference with attorney Massey regarding status of the proposed settlement and bankruptcy matters. | | | | | | | | | | | | | | | |
| 09/13/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 175.00 | 250.00 | 0.70 | 175.00 | 250.00 | 10000 | | 823726 | Billed |
| 09/14/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.30 | 63.00 | 210.00 | 0.30 | 63.00 | 210.00 | 10000 | | 823726 | Billed |
| Detailed review of the proposed order in the bankruptcy court and analysis with Attorney Morgan regarding the same | | | | | | | | | | | | | | | |
| 09/14/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conference with Mr. McBride to discuss details | | | | | | | | | | | | | | | |
| 09/15/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 175.00 | 250.00 | 0.70 | 175.00 | 250.00 | 10000 | | 823726 | Billed |
| Obtain certified court docket for attorney McBride. | | | | | | | | | | | | | | | |
| 09/17/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conference with Dr. Sandy regarding proposed settlement and Unvest. | | | | | | | | | | | | | | | |
| 09/19/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.50 | 375.00 | 250.00 | 1.50 | 375.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of Massey filings in the District Court. Forward to Dr. Sandy for review and comment. | | | | | | | | | | | | | | | |
| 09/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.30 | 1,075.00 | 250.00 | 4.30 | 1,075.00 | 250.00 | 10000 | | 823726 | Billed |
| Research IDB | | | | | | | | | | | | | | | |
| 09/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of bankruptcy motion to rescind Medicare billing. Forward to attorney Massey and Dr. Sandy. | | | | | | | | | | | | | | | |
| 09/21/2017 | 2334 | Wendt, Katherine E | 30 | Associate | 1 | 0.30 | 63.00 | 210.00 | 0.30 | 63.00 | 210.00 | 10000 | | 823726 | Billed |
| Preliminary analysis of issues to be researched regarding the entry of default, stay of proceedings, | | | | | | | | | | | | | | | |
| 09/21/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.70 | 1,175.00 | 250.00 | 4.70 | 1,175.00 | 250.00 | 10000 | | 823726 | Billed |
| Write First Amended Complaint for presentation to the Trustee's attorney for review and possible consent to the automatic stay lifting by the Bankruptcy Court. Forward to attorney McBride for review and presentation. | | | | | | | | | | | | | | | |
| 09/21/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 100.00 | 250.00 | 0.40 | 100.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of various email communications from attorney Massey and attorney McBride regarding to | | | | | | | | | | | | | | | |
| 09/22/2017 | 2263 | Roseman, Rachael M | 30 | Associate | 1 | 0.90 | 189.00 | 210.00 | 0.90 | 189.00 | 210.00 | 10000 | | 823726 | Billed |
| Detailed review and revision of the First Amended Complaint | | | | | | | | | | | | | | | |
| 09/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.70 | 425.00 | 250.00 | 1.70 | 425.00 | 250.00 | 10000 | | 823726 | Billed |
| Write revisions to the First Amended Complaint. Forward to Dr. Sandy for review. Telephone conference with Dr. Sandy regarding same. | | | | | | | | | | | | | | | |
| 09/26/2017 | 2334 | Wendt, Katherine E | 30 | Associate | 1 | 2.30 | 483.00 | 210.00 | 2.30 | 483.00 | 210.00 | 10000 | | 823726 | Billed |
| Research IDB | | | | | | | | | | | | | | | |
| 09/26/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.60 | 650.00 | 250.00 | 2.60 | 650.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of various emails from attorney McBride regarding the motion to lift stay and the 105 motion. Receipt of proposed settlement from attorney Massey and forward to Drs. Sandy and Blair. Telephone conference with attorney McBride regarding first amended complaint and Trustee's attorney review. | | | | | | | | | | | | | | | |
| 09/27/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.30 | 1,325.00 | 250.00 | 5.30 | 1,325.00 | 250.00 | 10000 | | 823726 | Billed |
| Multiple reviews of proposed settlement. Telephone conference with attorney Massey regarding same. Write email outlining all of the issues to physicians and request review/response. Telephone conference with Dr. Blair and Dr. Bhatnagar. | | | | | | | | | | | | | | | |
| 09/28/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.70 | 1,175.00 | 250.00 | 4.70 | 1,175.00 | 250.00 | 10000 | | 823726 | Billed |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|---|---------|----------------|-------------|---------------|------|----------|----------|-----------|---------|---------|----------|---------|----------|---------|--------|
| Telephone conferences with attorney McBride regarding bankruptcy and various issues with same. Communication with Kent County Circuit Court and forwarding of information to the Court. Hold status conference and meet with Dr. Sandy regarding proposed settlement. | | | | | | | | | | | | | | | |
| 09/29/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.50 | 375.00 | 250.00 | 1.50 | 375.00 | 250.00 | 10000 | | 823726 | Billed |
| Prepare for and hold telephone conference with attorneys regarding proposed settlement and possible courses of action. | | | | | | | | | | | | | | | |
| 09/29/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.90 | 225.00 | 250.00 | 0.90 | 225.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conference with Dr. Sandy regarding MHT, proposed settlement and conference with attorneys. | | | | | | | | | | | | | | | |
| 10/03/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conference with physician attorneys regarding bankruptcy matter and to discuss proposed settlement content. | | | | | | | | | | | | | | | |
| 10/04/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.70 | 925.00 | 250.00 | 3.70 | 925.00 | 250.00 | 10000 | | 823726 | Billed |
| | | | | | | | | | | | | | | | |
| 10/09/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.60 | 150.00 | 250.00 | 0.60 | 150.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of Motion to Approval Sale of Property. Forward to Dr. Sandy for comment. | | | | | | | | | | | | | | | |
| 10/12/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.60 | 400.00 | 250.00 | 1.60 | 400.00 | 250.00 | 10000 | | 823726 | Billed |
| Receipt and review of Scott Postle testimony at continued 341 Hearing. | | | | | | | | | | | | | | | |
| 10/18/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.30 | 825.00 | 250.00 | 3.30 | 825.00 | 250.00 | 10000 | | 823726 | Billed |
| Write and forward proposed settlement analysis and up-date to physician group regarding current issues and areas to address. | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| 10/22/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.70 | 675.00 | 250.00 | 2.70 | 675.00 | 250.00 | 10000 | | 823726 | Billed |
| Preparation for telephone conference with physician group regarding proposed settlement. Hold telephone conference to discuss the benefits and disadvantages of accepting settlement and joining class action. | | | | | | | | | | | | | | | |
| 10/24/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.40 | 600.00 | 250.00 | 2.40 | 600.00 | 250.00 | 10000 | | 823726 | Billed |
| | | | | | | | | | | | | | | | |
| 10/25/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conferences with physician attorneys in Texas and South Carolina regarding the | | | | | | | | | | | | | | | |
| 10/27/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.70 | 925.00 | 250.00 | 3.70 | 925.00 | 250.00 | 10000 | | 823726 | Billed |
| Preparation for and attendance in physician telephone conference regarding discussion with attorney Massey regarding the proposed settlement. | | | | | | | | | | | | | | | |
| 10/30/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.30 | 575.00 | 250.00 | 2.30 | 575.00 | 250.00 | 10000 | | 823726 | Billed |
| Telephone conference with attorney Massey regarding physician meeting, bankruptcy, status of proposed order and physician reception to settlement proposal. Attention to emails and phone call from attorney McBride. | | | | | | | | | | | | | | | |
| 11/01/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 824199 | Billed |
| Receipt and review of various emails regarding retainer issues and | | | | | | | | | | | | | | | |
| 11/06/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 824199 | Billed |
| Telephone conference with Mr. McBride regarding bankruptcy stay and | | | | | | | | | | | | | | | |
| 11/07/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 175.00 | 250.00 | 0.70 | 175.00 | 250.00 | 10000 | | 824199 | Billed |
| Attention to pleadings filed in Bankruptcy Court regarding lifting of stay. Telephone conference with Ms Hadalry and Mr McBride to clarify | | | | | | | | | | | | | | | |
| 11/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.80 | 450.00 | 250.00 | 1.80 | 450.00 | 250.00 | 10000 | | 824199 | Billed |
| Telephone conference with Dana Campbell and Mike McBride regarding | | | | | | | | | | | | | | | |
| 11/20/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 824199 | Billed |
| Telephone conference with Drs Blair and Sandy to discuss possible strategies in the | | | | | | | | | | | | | | | |
| 11/28/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.20 | 800.00 | 250.00 | 3.20 | 800.00 | 250.00 | 10000 | | 824199 | Billed |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|--|---------|---------------------|-------------|----------------|------|----------|----------|-----------|---------|----------|----------|---------|----------|---------|----------|
| 11/30/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.60 | 1,150.00 | 250.00 | 4.60 | 1,150.00 | 250.00 | 10000 | | 824199 | Billed |
| Telephone conferences with attorneys Haidary and Tawill regarding Monday phone conference. Telephone conference with Dr. Sandy regarding up-coming phone conference with physicians. | | | | | | | | | | | | | | | |
| 12/04/2017 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 4.20 | 1,050.00 | 250.00 | 4.20 | 1,050.00 | 250.00 | 10000 | | 825589 | Billed |
| Prepare for telephone conference with attorneys regarding the executed [redacted] litigation cooperation agreement. | | | | | | | | | | | | | | | |
| 01/08/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 826793 | Billed |
| Telephone conference with Dr. Sandy regarding class action status. | | | | | | | | | | | | | | | |
| 01/12/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 175.00 | 250.00 | 0.70 | 175.00 | 250.00 | 10000 | | 826793 | Billed |
| Receipt and review of pleadings from attorney McBride regarding continuation. | | | | | | | | | | | | | | | |
| 01/24/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 150.00 | 250.00 | 0.80 | 150.00 | 250.00 | 10000 | | 826793 | Billed |
| Telephone conference with Dr. Sandy regarding class action issues. | | | | | | | | | | | | | | | |
| 01/26/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.50 | 375.00 | 250.00 | 1.50 | 375.00 | 250.00 | 10000 | | 826793 | Billed |
| Telephone conference with [redacted] | | | | | | | | | | | | | | | |
| 01/30/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | | 826793 | Billed |
| Receipt and review of draft CPA opinion letter from attorney Massey. | | | | | | | | | | | | | | | |
| 02/03/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 2.50 | 687.50 | 275.00 | 2.50 | 687.50 | 275.00 | 10000 | | 0 | Unbilled |
| [redacted] | | | | | | | | | | | | | | | |
| 02/04/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 3.20 | 880.00 | 275.00 | 3.20 | 880.00 | 275.00 | 10000 | | 0 | Unbilled |
| Research [redacted] | | | | | | | | | | | | | | | |
| 02/05/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.60 | 150.00 | 250.00 | 0.60 | 150.00 | 250.00 | 10000 | | 0 | Unbilled |
| Telephone conference with attorney McBride regarding bankruptcy issues. Telephone conference with Dr. Sandy regarding settlement email. | | | | | | | | | | | | | | | |
| 02/06/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 0.80 | 220.00 | 275.00 | 0.80 | 220.00 | 275.00 | 10000 | | 0 | Unbilled |
| Finalize research; meet with Mr. Morgan regarding same | | | | | | | | | | | | | | | |
| 02/09/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.40 | 350.00 | 250.00 | 1.40 | 350.00 | 250.00 | 10000 | | 0 | Unbilled |
| Draft and forward email pertaining to [redacted] | | | | | | | | | | | | | | | |
| 02/10/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.40 | 100.00 | 250.00 | 0.40 | 100.00 | 250.00 | 10000 | | 0 | Unbilled |
| Telephone conference with Dr. Sandy regarding status of the case. | | | | | | | | | | | | | | | |
| 02/12/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.30 | 325.00 | 250.00 | 1.30 | 325.00 | 250.00 | 10000 | | 0 | Unbilled |
| Telephone conference with Mr. Massey regarding current status of the settlement and physician positions. | | | | | | | | | | | | | | | |
| 02/12/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.30 | 75.00 | 250.00 | 0.30 | 75.00 | 250.00 | 10000 | | 0 | Unbilled |
| Telephone conference with Dr. Sandy regarding phone discussion with Mr. Massey. | | | | | | | | | | | | | | | |
| 02/13/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.70 | 175.00 | 250.00 | 0.70 | 175.00 | 250.00 | 10000 | | 0 | Unbilled |
| Receipt and review of email communication from attorney McBride regarding [redacted] | | | | | | | | | | | | | | | |
| 02/15/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.60 | 400.00 | 250.00 | 1.60 | 400.00 | 250.00 | 10000 | | 0 | Unbilled |
| Receipt and review of [redacted] Telephone conference with Dr. Sandy regarding same. | | | | | | | | | | | | | | | |
| 02/15/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | | 0 | Unbilled |

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Time Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Attorney Name | Staff Level | Description | Rate | Orig Hrs | Orig Amt | Orig Rate | Rev Hrs | Rev Amt | Rev Rate | Service | Activity | Invoice | Status |
|---|---------|---------------------|-------------|----------------|------|----------|------------|-----------|---------|------------|----------|---------|----------|---------|----------|
| Telephone conference with attorney Haidry regarding settlement and her clients' position. | | | | | | | | | | | | | | | |
| 02/16/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | 0 | | Unbilled |
| Telephone conference with attorney Massey regarding Ascentium review of our objection. Discuss Houston doctors and our current position. | | | | | | | | | | | | | | | |
| 02/20/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.80 | 450.00 | 250.00 | 1.80 | 450.00 | 250.00 | 10000 | 0 | | Unbilled |
| Receipt and review of [REDACTED] | | | | | | | | | | | | | | | |
| 02/21/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.70 | 675.00 | 250.00 | 2.70 | 675.00 | 250.00 | 10000 | 0 | | Unbilled |
| Receipt and review of email communications from Dr. Sandy. Telephone conference with Mr. Massey regarding Ascentium [REDACTED]. Telephone conference with DR. Sandy to address questions and issues. Discussion with Mr. Dornbos regarding [REDACTED] | | | | | | | | | | | | | | | |
| 02/21/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 3.50 | 962.50 | 275.00 | 3.50 | 962.50 | 275.00 | 10000 | 0 | | Unbilled |
| Analyze all relevant documents, procedures, and rules related to [REDACTED] | | | | | | | | | | | | | | | |
| 02/22/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 3.90 | 975.00 | 250.00 | 3.90 | 975.00 | 250.00 | 10000 | 0 | | Unbilled |
| Discussions with Mr. Dornbos regarding [REDACTED]. Telephone conferences with attorney Massey regarding [REDACTED]. Receipt and review of response to [REDACTED]. Telephone conference with attorney McBride regarding [REDACTED] | | | | | | | | | | | | | | | |
| 02/22/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 5.20 | 1,430.00 | 275.00 | 5.20 | 1,430.00 | 275.00 | 10000 | 0 | | Unbilled |
| Analyze settlement agreement; [REDACTED] | | | | | | | | | | | | | | | |
| 02/23/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 5.60 | 1,400.00 | 250.00 | 5.60 | 1,400.00 | 250.00 | 10000 | 0 | | Unbilled |
| [REDACTED] | | | | | | | | | | | | | | | |
| 02/23/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 7.50 | 2,062.50 | 275.00 | 7.50 | 2,062.50 | 275.00 | 10000 | 0 | | Unbilled |
| Draft objection; attend conference call with Dr. Sandy; [REDACTED] | | | | | | | | | | | | | | | |
| 02/24/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 0.80 | 200.00 | 250.00 | 0.80 | 200.00 | 250.00 | 10000 | 0 | | Unbilled |
| Telephone conference with Mr. Massey regarding [REDACTED] | | | | | | | | | | | | | | | |
| 02/24/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 1.20 | 300.00 | 250.00 | 1.20 | 300.00 | 250.00 | 10000 | 0 | | Unbilled |
| Draft and forward status emails to all physicians plus copies of the [REDACTED] | | | | | | | | | | | | | | | |
| 02/24/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 2.50 | 687.50 | 275.00 | 2.50 | 687.50 | 275.00 | 10000 | 0 | | Unbilled |
| Research regarding the mechanics of the settlement; [REDACTED] | | | | | | | | | | | | | | | |
| 02/25/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.20 | 550.00 | 250.00 | 2.20 | 550.00 | 250.00 | 10000 | 0 | | Unbilled |
| Telephone conference with physician group to discuss settlement issues [REDACTED]. All physicians to opt-in. Telephone conferences with Mr. Massey regarding [REDACTED] | | | | | | | | | | | | | | | |
| 02/25/2018 | 2349 | Dornbos, Jeffrey S. | 29 | Senior Counsel | 1 | 6.30 | 1,457.50 | 275.00 | 5.30 | 1,457.50 | 275.00 | 10000 | 0 | | Unbilled |
| [REDACTED] | | | | | | | | | | | | | | | |
| 02/26/2018 | 2052 | Morgan, Kirk W | 15 | B Shareholder | 1 | 2.20 | 550.00 | 250.00 | 2.20 | 550.00 | 250.00 | 10000 | 0 | | Unbilled |
| Preparation for [REDACTED] | | | | | | | | | | | | | | | |
| Report Totals: | | | | | | 537.80 | 119,774.00 | | 479.40 | 119,819.50 | | | | | |

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App. No. 062

Cost Report

Billed and Unbilled

Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)

02/27/2018

| Date | SM/Task | Service Code | Description | Attorney | Orig Qty | Orig Amt | Rev Qty | Rev Amt | Vendor | Voucher | Check No | Check Date | Check Status | Invoice | Status |
|------------|---------|--------------|---|----------|----------|----------|---------|----------|-----------------------------------|---------|----------|------------|--------------|---------|--------|
| 02/06/2017 | | E112 | Court Cost | 2052 | 0.00 | 235.00 | 0.00 | 235.00 | Clerk of Court | 462991 | 0 | | | 811776 | Billed |
| | | | Kent County Circuit Court - Filing fee | | | | | | | | | | | | |
| 02/06/2017 | | E125 | Filing Fee \ Record Request | 2052 | 0.00 | 260.00 | 0.00 | 260.00 | Kent County Circuit Court | 463003 | 1105378 | 02/06/2017 | Cleared | 811776 | Billed |
| | | | Filing Fees | | | | | | | | | | | | |
| 02/06/2017 | | E112 | Court Cost | 2052 | 0.00 | -235.00 | 0.00 | -235.00 | Clerk of Court | 462991 | 0 | | | 811776 | Billed |
| | | | Kent County Circuit Court - Filing fee Void Check # - 001105369 | | | | | | | | | | | | |
| 02/08/2017 | | E107 | Courier | 2052 | 0.00 | 113.10 | 0.00 | 113.10 | United Parcel Service | 463375 | 1105768 | 02/24/2017 | Cleared | 811776 | Billed |
| | | | Courier, United Parcel Service | | | | | | | | | | | | |
| 02/15/2017 | | E108 | Postage | COST | 0.00 | 78.45 | 0.00 | 78.45 | | 0 | | | | 811776 | Billed |
| | | | Postage | | | | | | | | | | | | |
| 02/21/2017 | | E123 | IME\Prepaid Dep.\Other Professionals | 2052 | 0.00 | 375.00 | 0.00 | 375.00 | Federal Investigation Service Inc | 463968 | 1105980 | 03/09/2017 | Cleared | 811776 | Billed |
| | | | Professionals, Federal Investigation Service Inc | | | | | | | | | | | | |
| 02/28/2017 | | E106 | Online Research | 2052 | 0.00 | 65.48 | 0.00 | 65.48 | LexisNexis | 464141 | 1106177 | 03/17/2017 | Cleared | 811776 | Billed |
| | | | Online Research, LexisNexis | | | | | | | | | | | | |
| 03/01/2017 | | E123 | IME\Prepaid Dep.\Other Professionals | 2052 | 0.00 | 110.00 | 0.00 | 110.00 | Federal Investigation Service Inc | 463970 | 1105981 | 03/09/2017 | Cleared | 811776 | Billed |
| | | | Professionals Services, Federal Investigation Service Inc | | | | | | | | | | | | |
| 03/31/2017 | | E106 | Online Research | 2052 | 0.00 | 3.20 | 0.00 | 3.20 | Pacer Service Center | 465419 | 1106905 | 04/25/2017 | Cleared | 813386 | Billed |
| | | | Online Research, Pacer Service Center | | | | | | | | | | | | |
| 05/17/2017 | | E118 | Records\Litigation Support | 2052 | 0.00 | 6.00 | 0.00 | 6.00 | US Bank | 466573 | 626 | 06/26/2017 | Cleared | 814975 | Billed |
| | | | Records\Litigation Support, Harris County District | | | | | | | | | | | | |
| 05/19/2017 | | E112 | Court Cost | 2052 | 0.00 | 7.92 | 0.00 | 7.92 | US Bank | 466574 | 626 | 06/26/2017 | Cleared | 814975 | Billed |
| | | | County of Orange - Filing fee | | | | | | | | | | | | |
| 05/29/2017 | | E106S | Online Research - WestLaw/Nexus Lexis | COST | 0.00 | 1,152.44 | 0.00 | 1,152.44 | | 0 | | | | 814975 | Billed |
| | | | Online Research Gordon | | | | | | | | | | | | |
| 06/22/2017 | | E106S | Online Research - WestLaw/Nexus Lexis | COST | 0.00 | 932.83 | 0.00 | 932.83 | | 0 | | | | 816876 | Billed |
| | | | Online Research Gordon | | | | | | | | | | | | |
| 06/23/2017 | | E118 | Records\Litigation Support | 2052 | 0.00 | 4.00 | 0.00 | 4.00 | US Bank | 467449 | 725 | 07/25/2017 | Cleared | 816876 | Billed |
| | | | Records\Litigation Support, County of Orange | | | | | | | | | | | | |
| 06/23/2017 | | E118 | Records\Litigation Support | 2052 | 0.00 | 7.64 | 0.00 | 7.64 | US Bank | 467450 | 725 | 07/25/2017 | Cleared | 816876 | Billed |
| | | | Records\Litigation Support, County of California | | | | | | | | | | | | |
| 06/26/2017 | | E119 | Expert Fees | 2052 | 0.00 | 1,500.00 | 0.00 | 1,500.00 | J Michael McBride PC | 467178 | 1108012 | 06/26/2017 | Cleared | 816876 | Billed |
| | | | Retainer - J Michael McBride PC | | | | | | | | | | | | |
| 06/26/2017 | | E107 | Courier | 2052 | 0.00 | 31.37 | 0.00 | 31.37 | United Parcel Service | 467661 | 1108471 | 07/18/2017 | Cleared | 816876 | Billed |
| | | | Courier, United Parcel Service | | | | | | | | | | | | |
| 06/30/2017 | | E106 | Online Research | 2052 | 0.00 | 27.30 | 0.00 | 27.30 | Pacer Service Center | 468005 | 1108598 | 07/21/2017 | Cleared | 818489 | Billed |

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Cost Report**Billed and Unbilled****Solarewicz, Maciej MD / Dr. Solarewicz, Dr. Starr et al re: Phys (87267-202838)****02/27/2018**

| Date | SM/Task | Service Code | Description | Attorney | Orig Qty | Orig Amt | Rev Qty | Rev Amt | Vendor | Voucher | Check No. | Check Date | Check Status | Invoice | Status |
|---|---------|--------------|----------------------------|----------|-------------|-----------------|-------------|-----------------|-------------------------|---------|-----------|------------|--------------|---------|--------|
| Pacer - Online Research | | | | | | | | | | | | | | | |
| 07/26/2017 | E115 | | Deposition Transcripts | 2052 | 0.00 | 449.00 | 0.00 | 449.00 | Lexitas | 468514 | 1109040 | 08/18/2017 | Cleared | 820081 | Billed |
| Lexitas - Deposition Transcripts | | | | | | | | | | | | | | | |
| 08/09/2017 | E9GR2 | | Refund - Chemical | 2052 | 0.00 | -89.80 | 0.00 | -89.80 | | 0 | | | | 820081 | Billed |
| Eric DeLeon portion (1/5) for LEXITAS / transcript - matter 202838 | | | | | | | | | | | | | | | |
| 08/09/2017 | E9GR2 | | Refund - Chemical | 2052 | 0.00 | -89.90 | 0.00 | -89.90 | | 0 | | | | 820081 | Billed |
| Cough Partners portion (1/5) for LEXITAS / transcript - matter 202838 | | | | | | | | | | | | | | | |
| 09/15/2017 | E118 | | Records/Litigation Support | 2052 | 0.00 | 19.00 | 0.00 | 19.00 | Kent County Court Clerk | 469517 | 1109600 | 09/15/2017 | Cleared | 823726 | Billed |
| Records/Litigation Support, Kent County Court Clerk | | | | | | | | | | | | | | | |
| 09/15/2017 | E107 | | Courier | 2052 | 0.00 | 31.75 | 0.00 | 31.75 | United Parcel Service | 469944 | 1109921 | 10/05/2017 | Cleared | 823726 | Billed |
| Courier, United Parcel Service | | | | | | | | | | | | | | | |
| 10/11/2017 | E115 | | Deposition Transcripts | 2052 | 0.00 | 498.00 | 0.00 | 498.00 | Lexitas | 472530 | 1111377 | 01/04/2018 | | 825569 | Billed |
| Deposition Transcripts - Lexitas | | | | | | | | | | | | | | | |
| 12/01/2017 | E106 | | Online Research | 2052 | 0.00 | 4.70 | 0.00 | 4.70 | US Bank | 471924 | 1227 | 12/27/2017 | | 825569 | Billed |
| Pacer - Online Research | | | | | | | | | | | | | | | |
| 01/08/2018 | E106 | | Online Research | 2052 | 0.00 | 9.90 | 0.00 | 9.90 | US Bank | 473270 | 0 | | | 826793 | Billed |
| Online Research, Pacer | | | | | | | | | | | | | | | |
| Report Totals: | | | | | 0.00 | 5,507.38 | 0.00 | 5,507.38 | | | | | | | |

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**DR. DEREK MELBY, and DANILO
POLICARPIO as individuals and on
behalf of all others similarly situated**

Plaintiffs,

v.

**AMERICA'S MHT, INC., SCOTT
POSTLE, ASCENTUM CAPITAL, LLC,
and CLIFF MCKENZIE**

Defendants.

Civil Action No. 3:17-CV-155-M

consolidated with
**Civil Action Nos. 3:17-CV-732-M;
3:17-CV-868-M; and 3:17-CV-963-M**

**DECLARATION OF ROBERT E. COUHIG JR. IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Robert E. Couhig Jr., declare as follows:

1. I am a member of the firm of Couhig Partners, LLC. I am submitting this declaration in support of my firm's application for an award of attorney's fees in connection with services rendered in the above-entitled action and the reimbursement of expenses incurred by my firm in the course of this litigation.

2. This firm is counsel of record for plaintiffs and class representatives, Dr. Derek Melby, Dr. Danilo Policarpio, Dr. David Guillot, and Dr. Jaideep Patel.

3. The identification and background of my firm, its partners, associates, and support staff, who devoted substantial time to this matter, was filed with the Motion for Preliminary approval and recorded as Rec. Doc. 59-2.

4. Through March 8, 2018, the total number of hours spent on this litigation by

my firm is 2,840.10 hours. The total lodestar amount for attorney/paralegal time is \$1,812,728.50. A breakdown of the lodestar is as follows:

HOURS

Inception through March 8, 2018

| ATTORNEY* | * | HOURS | RATE | LODESTAR |
|------------------|----|-----------------|----------|-----------------------|
| Rob Couhig, Jr. | P | 142.5 | \$775.00 | \$110,437.50 |
| Jeremy Fischbach | A | 17.5 | \$390.00 | \$6,825.00 |
| Cory Grant | A | 33.2 | \$390.00 | \$12,948.00 |
| Jonathan Lemann | P | 751.0 | \$550.00 | \$413,050.00 |
| Don Massey | P | 1460.4 | \$725.00 | \$1,058,790.00 |
| Jeff Pastorek | P | 432.1 | \$425.00 | \$183,642.50 |
| Tate Martin | PL | 3.4 | \$75.00 | \$255.00 |
| TOTAL: | | 2,840.10 | | \$1,812,728.50 |

*(P) = Partner
 (A) = Associate
 (PL) = Paralegal

5. Our firm performed substantial work for the benefit of the Class, including investigation of facts supporting allegations in the Complaint, responding to class member inquiries, and preparation and filing of the Complaint and Amended Complaint and other pleadings and motions, and the negotiation of the Partial Class Settlement.

6. My firm incurred a total of \$26,780.50 in unreimbursed expenses in connection with the prosecution of this litigation. These expenses are broken down as follows:

EXPENSES

From Inception through March 10, 2018

| | |
|-------------------------------------|-------------|
| Consultants | \$14,338.75 |
| Filing Fees and Miscellaneous Costs | \$136.33 |
| Travel | \$12,305.42 |

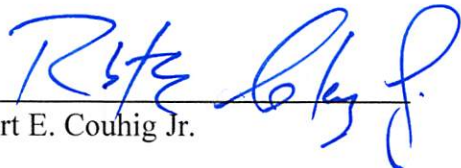
7. The expenses incurred pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred. See redacted billing records attached as Exhibit A hereto.

8. Given that there was tremendous pressure to mitigate damage and end the perpetuation of the fraudulent scheme at issue, my team prioritized this litigation and devoted considerable time and effort particularly in the early part of 2017.

9. The prioritization of this case certainly impacted the firm's normal course of business.

10. While the firm did not neglect other matters in which it was engaged, it was forced to curtail business development opportunities which precluded other employment.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of March, 2018 at 1100 Poydras Street, Suite 3250, New Orleans, Louisiana 70163.


Robert E. Couhig Jr.

Date: March 9, 2018

Respectfully submitted,

/s/ Jonathan P. Lemann
E. Leon Carter
Texas Bar No. 03914300
lcarter@carterscholer.com
Joshua J. Bennett
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Couhig Partners, LLC
Robert E. Couhig, Jr.,
Texas Bar No. 04877400
Louisiana Bar Roll No 4439
Donald C. Massey,
Louisiana Bar Roll No. 14177
Jonathan P. Lemann,
Texas Bar No. 24054333
Louisiana Bar Roll No. 26380
Jeffrey T. Pastorek,
Louisiana Bar Roll No. 33309
1100 Poydras Street, Suite 1150
New Orleans, LA 70163
Telephone: (504) 588-128
Telecopier: (504) 588-9750

ATTORNEYS FOR PLAINTIFFS

Exhibit RC-A



Invoice # 2343
Date: 03/09/2018
Due On: 04/08/2018

3250 Energy Centre, 1100 Poydras Street
New Orleans, Louisiana 70163
United States

Dr. Derek Melby

1713.001/Multi-party lawsuit against America's MHT, Inc., Ascentium Capital LLC, Univest Capital LLC, etc.

Services

| Date | Attorney | Description | Quantity | Rate | Total |
|------------|----------|--|----------|----------|------------|
| 12/15/2016 | RC | Discussions with potential clients; review file materials. | 1.00 | \$775.00 | \$775.00 |
| 12/17/2016 | RC | Discussions with potential clients; review file materials. | 1.50 | \$775.00 | \$1,162.50 |
| 12/18/2016 | RC | Discussions with potential clients; review file materials. | 1.00 | \$775.00 | \$775.00 |
| 12/19/2016 | DM | Review materials re MHT from various physicians; confer REC; confer CP lawyers; review file materials forwarded; assess possible claims; attempt to understand scheme; review multiple correspondence/ email exchanges; commence review of extensive materials; assess; confer and coordinate review and analysis of potential claims; participate in call with potential class members. | 4.10 | \$725.00 | \$2,972.50 |
| 12/19/2016 | RC | Confer CP lawyers; review file materials forwarded. | 4.10 | \$775.00 | \$3,177.50 |
| 12/20/2016 | DM | Continue to review and digest substantial materials; map out flow of documents with MHT and physicians; attempt to understand financing aspects | 3.50 | \$725.00 | \$2,537.50 |
| 12/21/2016 | DM | Conference call with impacted MHT physicians; prepare for same; review correspondence/ email from MHT; assess possible securities issues; Continue review of multiple materials; assess and confer. | 7.10 | \$725.00 | \$5,147.50 |
| 12/22/2016 | DM | Review multiple correspondence/ email among doctors, CP and others; confer; review materials re potential claims; assess and analysis of multiple potential class member materials; conferences; assess claims. | 3.10 | \$725.00 | \$2,247.50 |
| 12/22/2016 | RC | Meeting regarding potential causes of action with Couhig Partners team | 0.50 | \$775.00 | \$387.50 |

| | | | | | |
|------------|----|---|------|----------|------------|
| 12/23/2016 | DM | Calls from doctors victimized by MHT; assess materials; continue to assess potential claims and causes of action; assess venue and jurisdiction issues; assess possible claims under [REDACTED]; analysis [REDACTED]. | 4.50 | \$725.00 | \$3,262.50 |
| 12/24/2016 | DM | Review draft summary of MHT claims; draft correspondence/ email to CP team; analysis. | 0.40 | \$725.00 | \$290.00 |
| 12/24/2016 | RC | Receive, review, and respond to correspondence from Couhig Partners team | 0.30 | \$775.00 | \$232.50 |
| 12/26/2016 | DM | Continue to digest documents from individual claimants; assess law re [REDACTED]; confer. | 0.50 | \$725.00 | \$362.50 |
| 12/27/2016 | JP | Analysis, conferences, correspondence regarding new matter and information from individual claimants; receive and review substantial materials from potential and current clients related to their experiences with MHT. | 4.00 | \$425.00 | \$1,700.00 |
| 12/27/2016 | DM | Correspondence/ email exchanges with Dr. Kumar and Green; analysis of Kumar issues; review and correspondence/ email with Dr. Melby assess Melby issues; | 2.70 | \$725.00 | \$1,957.50 |
| 12/27/2016 | RC | Conferences regarding potential lawsuits | 1.50 | \$775.00 | \$1,162.50 |
| 12/28/2016 | JP | Analysis, conferences, correspondence, fact investigation, and legal research regarding substantial materials from potential and current clients related to their experiences with MHT. | 7.00 | \$425.00 | \$2,975.00 |
| 12/28/2016 | DM | Prepare for and attend conference call with multiple prospective class members; assess Ascentium issues; research class issues; analysis of [REDACTED]; assess [REDACTED] issues; multiple correspondence/ email exchanges and conferences. | 5.30 | \$725.00 | \$3,842.50 |
| 12/28/2016 | RC | Conferences regarding potential lawsuits and new file materials. | 1.50 | \$775.00 | \$1,162.50 |
| 12/29/2016 | JP | Analysis of materials from potential and current clients related to MHT and legal research regarding [REDACTED]. | 1.40 | \$425.00 | \$595.00 |
| 12/29/2016 | DM | Continue review of materials; review draft complaint; analysis of [REDACTED] and related issues; review facts provided by former employee. | 2.10 | \$725.00 | \$1,522.50 |
| 12/29/2016 | RC | Conferences with potential clients re lawsuit. | 0.70 | \$775.00 | \$542.50 |
| 01/02/2017 | JP | Analysis of materials from potential and current clients related to MHT and legal research regarding [REDACTED]. | 1.50 | \$425.00 | \$637.50 |
| 01/02/2017 | JL | Confer with potential clients. Legal research [REDACTED]. Review client documents. | 1.70 | \$550.00 | \$935.00 |
| 01/02/2017 | DM | Review Dr. Obi materials; confer and assess best approach to suit; confer re other claims and lawyers. | 1.70 | \$725.00 | \$1,232.50 |

| | | | | | |
|------------|----|---|------|----------|------------|
| 01/02/2017 | RC | Meetings with team and discussions with clients re potential lawsuit. | 1.00 | \$775.00 | \$775.00 |
| 01/03/2017 | JP | Analysis of materials from clients and fact witnesses related to MHT and legal research regarding [REDACTED]. | 2.70 | \$425.00 | \$1,147.50 |
| 01/03/2017 | JL | Legal research [REDACTED]. | 2.60 | \$550.00 | \$1,430.00 |
| 01/03/2017 | DM | Review multiple sets of class member materials; assess claims and confer CP; coordinate class action allegations; review factual materials; review correspondence/ email and draft multiple correspondence/ email. | 3.90 | \$725.00 | \$2,827.50 |
| 01/04/2017 | JP | Conferences with potential and current clients, as well as with CP attorneys, and analysis of documents received from clients and fact witnesses | 4.60 | \$425.00 | \$1,955.00 |
| 01/04/2017 | JL | Legal research and draft memo [REDACTED]. | 2.70 | \$550.00 | \$1,485.00 |
| 01/04/2017 | DM | Extensive correspondence/ email exchanges; conferences with class members; assess status of claims and drafting of complaints and causes of action; assess Univest; research likely defendants; confer and coordinate; draft multiple correspondence/ email. | 4.40 | \$725.00 | \$3,190.00 |
| 01/04/2017 | RC | Analysis for complaint | 1.20 | \$775.00 | \$930.00 |
| 01/05/2017 | JP | Conferences regarding complaint and causes of action; drafting portions of complaint; and legal research regarding [REDACTED] | 6.00 | \$425.00 | \$2,550.00 |
| 01/05/2017 | JL | Review documents and conference call with potential claimants. | 1.30 | \$550.00 | \$715.00 |
| 01/05/2017 | DM | Multiple conferences re status of [REDACTED]; review multiple materials; conferences with clients and potential clients; review research; consider possible claims, venue and related information; conferences with clients; review proposed MHT restructure; assess securities issues. | 6.80 | \$725.00 | \$4,930.00 |
| 01/05/2017 | RC | Conference call with potential claimants. | 0.80 | \$775.00 | \$620.00 |
| 01/06/2017 | JP | Analysis of materials from clients and fact witnesses related to MHT scheme; legal research regarding [REDACTED]; and conference call with potential clients | 6.00 | \$425.00 | \$2,550.00 |
| 01/06/2017 | JL | Conference call with potential clients. | 1.10 | \$550.00 | \$605.00 |
| 01/06/2017 | DM | Review multiple correspondence/ email/ texts from Latterman. Confer Latterman; confer Dr. Sandy; review multiple correspondence/ email exchanges; review correspondence/ email from Dr. Obi; analysis of materials re call with MHT; multiple conferences CP counsel; draft multiple correspondence/ email to Dr. Sandy and potential witnesses; assess MI counsel; draft correspondence/ email to MI counsel; review responsive correspondence/ email; review correspondence/ email from client DP – PA; | 8.40 | \$725.00 | \$6,090.00 |

| | | | | | |
|------------|----|--|------|----------|------------|
| | | conference re same; review witness correspondence/ email exchanges; coordinate conferences with MHT witnesses. | | | |
| 01/06/2017 | RC | Conference call with potential clients. | 1.10 | \$775.00 | \$852.50 |
| 01/07/2017 | JP | Conferences with Mr. Massey and witnesses and legal research on [REDACTED]. | 2.10 | \$425.00 | \$892.50 |
| 01/07/2017 | DM | Review materials; correspondence/ email witnesses; confer witnesses; confer MI counsel; review Texas lawsuit; review second Texas lawsuit; analysis re [REDACTED] and research issues; analysis and review [REDACTED]; multiple communications with clients. | 4.80 | \$725.00 | \$3,480.00 |
| 01/08/2017 | JL | Review McAllen Texas lawsuits. | 0.50 | \$550.00 | \$275.00 |
| 01/08/2017 | DM | Confer witnesses; review materials from MHT; coordinate claims; review multiple correspondence/ email exchanges; frame class action relief; frame individual relief requests; assess [REDACTED]; review Hildago County cases; assess counsel. | 4.40 | \$725.00 | \$3,190.00 |
| 01/09/2017 | JP | Draft complaint and participate in meetings and conferences with CP lawyers and clients. | 6.00 | \$425.00 | \$2,550.00 |
| 01/09/2017 | JL | Conference calls with potential clients. | 1.00 | \$550.00 | \$550.00 |
| 01/09/2017 | DM | Ongoing communications with physicians; confer Lattermans at length; confer Dr. Kahn; assess viability of claims; confer [REDACTED]; confer [REDACTED]; coordinate factual investigation and due diligence; assess Univest role in scheme; assess Ascentium role in scheme; confer among CP; reach out to possible witnesses; assess status of other claims; review correspondence/ email to Ascentium; review MHT materials; assess OHMT; assess possible individual defendants; lengthy communication with Lattermans. | 7.30 | \$725.00 | \$5,292.50 |
| 01/09/2017 | RC | Conference calls with potential clients. | 1.00 | \$775.00 | \$775.00 |
| 01/10/2017 | JP | Draft complaint; legal research regarding [REDACTED] fact investigation, and related conferences with other attorneys representing MHT doctors and clients about underlying facts and strategy. | 5.10 | \$425.00 | \$2,167.50 |
| 01/10/2017 | JL | Legal research [REDACTED] Review client materials. Participate in conference calls. | 3.00 | \$550.00 | \$1,650.00 |
| 01/10/2017 | DM | Confer Ike Tawil; review pleadings; assess McAllen Texas claims; multiple conferences with physicians; review multiple correspondence/ email exchanges; review Kumar materials; assess causes of action; assess [REDACTED]; coordinate travel to McAllen. | 7.10 | \$725.00 | \$5,147.50 |
| 01/11/2017 | JP | Legal research on [REDACTED]. | 2.10 | \$425.00 | \$892.50 |
| 01/11/2017 | JL | Work on fact development. | 1.10 | \$550.00 | \$605.00 |

| | | | | | |
|------------|----|--|-------|----------|------------|
| 01/11/2017 | DM | Confer counsel in TX; multiple correspondence/ email and memorandum; confer Dr. Latterman; confer Steve Latterman; multiple conferences with CP; assess [REDACTED]; travel to McAllen; review and assess NDA; draft correspondence/ email re same; review CP draft complaint; review TX counsel complaints; assess. Review correspondence/ email from [REDACTED]; confer re [REDACTED]; confer [REDACTED]. | 13.60 | \$725.00 | \$9,860.00 |
| 01/11/2017 | RC | Multiple conferences with CP team. | 1.00 | \$775.00 | \$775.00 |
| 01/12/2017 | JL | Work on complaint. Review client materials. | 2.10 | \$550.00 | \$1,155.00 |
| 01/12/2017 | DM | Meet and confer with Ike Tawil; confer CP; assess Joe West issues; review multiple correspondence/ email exchanges among clients; assess and evaluate [REDACTED]; assess [REDACTED]; review research and related matters; return travel; multiple conferences en route; assess venue and jurisdictional issues; confer re [REDACTED]. | 12.50 | \$725.00 | \$9,062.50 |
| 01/13/2017 | JP | Draft complaint, including fact investigation and legal research on [REDACTED] | 5.50 | \$425.00 | \$2,337.50 |
| 01/13/2017 | JL | Work on drafting complaint. Review client correspondence. Research [REDACTED] | 3.70 | \$550.00 | \$2,035.00 |
| 01/13/2017 | DM | Confer Latterman (Class member); assess current client status; multiple correspondence/ email exchanges with clients re meetings; assess [REDACTED]; review and substantial revisions to complaint; multiple correspondence/ email exchanges. | 7.50 | \$725.00 | \$5,437.50 |
| 01/14/2017 | JP | Additional drafting of complaint, including fact investigation and legal research on [REDACTED] | 7.40 | \$425.00 | \$3,145.00 |
| 01/14/2017 | JL | Draft complaint. Legal research [REDACTED]. Legal research [REDACTED]. | 2.70 | \$550.00 | \$1,485.00 |
| 01/14/2017 | DM | Multiple conferences with CP lawyers; draft correspondence/ email to Ike Tawil; review and multiple revisions to various drafts of class complaint; multiple correspondence/ email exchanges with clients; assess engagements and conduct/ course of conduct issues impacting clients in Texas; confer; multiple correspondence/ email; coordinate conference call with clients in 1/15/2017; coordination of filing of complaint; calls and communications with possible local counsel in Dallas. | 8.10 | \$725.00 | \$5,872.50 |
| 01/14/2017 | CA | Research regarding [REDACTED] | 3.50 | \$390.00 | \$1,365.00 |
| 01/14/2017 | RC | Multiple conferences with CP lawyers team. Work on complaint | 2.20 | \$775.00 | \$1,705.00 |
| 01/15/2017 | JL | Work on crafting complaint. Legal research [REDACTED] | 2.00 | \$550.00 | \$1,100.00 |

| | | | | | |
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| 01/15/2017 | DM | Review multiple correspondence/ email exchanges; multiple conferences with CP re complaint, [REDACTED]; [REDACTED]; factual basis re Ascentium, MHT, and various individuals; review and assess engagement; communication to TX counsel; assess [REDACTED]; assess [REDACTED]; multiple revisions and versions of Complaint; assess [REDACTED]; [REDACTED]; prepare for and attend lengthy call with client; review multiple correspondence/ email exchanges; confer CP; advance Complaint. | 10.60 | \$725.00 | \$7,685.00 |
| 01/15/2017 | RC | Multiple conferences; work on complaint | 1.50 | \$775.00 | \$1,162.50 |
| 01/16/2017 | JP | Fact investigation, legal research, conferences and correspondence related to drafting and finalizing class action complaint | 7.50 | \$425.00 | \$3,187.50 |
| 01/16/2017 | DM | Confer CP; confer clients; multiple correspondence/ email exchanges; calls to and from TX counsel; assess [REDACTED]; [REDACTED]; assess approach to [REDACTED]; confer and coordinate Complaint; multiple additional revisions and versions of draft Complaint; draft correspondence/ email to TX counsel; assess same. | 10.20 | \$725.00 | \$7,395.00 |
| 01/16/2017 | CA | Edits to class action complaint; conduct legal research on [REDACTED]. | 6.75 | \$390.00 | \$2,632.50 |
| 01/17/2017 | JL | Legal Research [REDACTED] Work on drafting complaint. Conference calls with co-counsel. Calls and communications with clients. | 5.75 | \$550.00 | \$3,162.50 |
| 01/17/2017 | JP | Fact investigation, legal research, conferences and correspondence with CP attorneys and clients related to finalizing class action complaint | 8.70 | \$425.00 | \$3,697.50 |
| 01/17/2017 | DM | Confer CP; confer clients; multiple correspondence/ email exchanges; calls to and from TX counsel; assess [REDACTED]; [REDACTED]; confer and coordinate Complaint; multiple additional revisions and versions of draft Complaint; draft correspondence/ email to TX counsel; assess same. | 9.70 | \$725.00 | \$7,032.50 |
| 01/17/2017 | CG | Legal Research re: [REDACTED] | 2.80 | \$390.00 | \$1,092.00 |
| 01/17/2017 | CA | Investigation regarding Postle, MHT, Ascentium, and Univest | 7.25 | \$390.00 | \$2,827.50 |
| 01/17/2017 | RC | Conferences and correspondence related to drafting and finalizing class action complaint and edits to same | 3.00 | \$775.00 | \$2,325.00 |
| 01/17/2017 | JL | Telephone conference with Stammel, and prepare for same. | 0.60 | \$550.00 | \$330.00 |
| 01/18/2017 | JL | Confer with clients. Legal research [REDACTED] Work on drafting complaint. Conference calls. | 6.00 | \$550.00 | \$3,300.00 |

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| 01/18/2017 | JP | Fact investigation, legal research, conferences and correspondence with CP attorneys and clients related to drafting and finalizing RICO class action complaint, and edits to same | 5.30 | \$425.00 | \$2,252.50 |
| 01/18/2017 | DM | Multiple calls, communications and emails re complaint; coordinate pro hac admissions. Provide materials re same; calls with Michigan counsel; address pro hac issues; assess and research [REDACTED]; review [REDACTED]; [REDACTED]; multiple correspondence/ email exchanges with class members; multiple correspondence/ email exchanges with other counsel; confer Houston counsel; review proposed NDA; review correspondence/ email to class members; correspondence/ email exchanges with Houston counsel; review correspondence/ email from McAllen counsel; confer and coordinate CP. | 9.40 | \$725.00 | \$6,815.00 |
| 01/18/2017 | CG | Legal Research re [REDACTED] | 2.00 | \$390.00 | \$780.00 |
| 01/19/2017 | JP | Conference calls with Mr. Massey and Ms. Haidery regarding underlying facts and strategy | 0.50 | \$425.00 | \$212.50 |
| 01/19/2017 | JP | Conferences and correspondence with clients and Mr. Massey regarding underlying facts and strategy | 1.80 | \$425.00 | \$765.00 |
| 01/19/2017 | DM | Calls with class members; call with Houston counsel; call with McAllen counsel; meet and confer; assess [REDACTED]; assess possible individual claims versus co-conspirators | 6.30 | \$725.00 | \$4,567.50 |
| 01/19/2017 | JL | Work on civil RICO lawsuit. | 1.80 | \$550.00 | \$990.00 |
| 01/20/2017 | JP | Correspondence with Dr. Green and CP attorneys regarding underlying facts. | 0.30 | \$425.00 | \$127.50 |
| 01/20/2017 | DM | Draft correspondence/ email to [REDACTED]; assess [REDACTED]; confer Josh; confer CP; coordinate RICO issues; review correspondence/ email from Latterman [REDACTED]; confer and coordinate; confer Hatten, attorney for fact witnesses with MHT knowledge; confer Dr. Green; confer CP; coordinate investigation; confer Latterman (class member); | 5.60 | \$725.00 | \$4,060.00 |
| 01/20/2017 | JL | Work on complaint for RICO relief. | 1.50 | \$550.00 | \$825.00 |
| 01/20/2017 | RC | Confer re Ascentium Demand and litigation strategy. | 1.00 | \$775.00 | \$775.00 |
| 01/21/2017 | JP | Receive and review correspondence from clients and Mr. Massey and conference call regarding underlying facts and strategy. | 1.00 | \$425.00 | \$425.00 |
| 01/21/2017 | JL | Conference calls regarding client contacts and litigation issues. | 1.00 | \$550.00 | \$550.00 |
| 01/22/2017 | DM | Correspondence/ email exchanges with [REDACTED]; confer CP; coordinate meetings in NC with class members; | 4.40 | \$725.00 | \$3,190.00 |

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| | | assess multiple client documents; address NC logistics; review materials from SDTx re RICO claim. | | | |
| 01/22/2017 | JL | Work on potential RICO claim. | 0.70 | \$550.00 | \$385.00 |
| 01/23/2017 | JP | Conferences with Mr. Massey and Mr. Couhig regarding [REDACTED]. | 0.20 | \$425.00 | \$85.00 |
| 01/23/2017 | DM | Prepare for and travel to NC; multiple correspondence/ email exchanges to coordinate and confirm multiple meetings with class members; confer CP; confer re financial issues - MHT/ Ascentium; assess approach for addressing [REDACTED]; meet with Green, Obi and Kumar; coordinate Daniel; coordinate [REDACTED] meeting logistics. | 13.30 | \$725.00 | \$9,642.50 |
| 01/23/2017 | JL | Draft RICO complaint. Attorney meeting to discuss case. | 4.60 | \$550.00 | \$2,530.00 |
| 01/23/2017 | RC | Conferences with team regarding new legal theories. | 0.20 | \$775.00 | \$155.00 |
| 01/24/2017 | DM | Prepare for and meet with Dr. Green; review and assess materials; review draft RICO complaint; confer; review correspondence/ email from TX counsel; review materials from Dr. Obi; review EFS notices re summons filings; return travel from Charlotte. | 11.10 | \$725.00 | \$8,047.50 |
| 01/24/2017 | JL | Calls to potential class members. Work on RICO complaint. | 2.70 | \$550.00 | \$1,485.00 |
| 01/25/2017 | DM | Confer CP re meetings with doctors; confer re RICO strategy; assess Uninvest issues; correspondence/ email from Dr. Obi [REDACTED]; review correspondence/ email from Leslie Latterman; review correspondence/ email from Dr. Melby; draft memorandum; confer re factual basis; confer CP; confer Dallas counsel (Josh) re status and developments. | 3.10 | \$725.00 | \$2,247.50 |
| 01/25/2017 | JL | Review class member documentation. Work on RICO complaint and research. Conference call with local counsel. | 5.00 | \$550.00 | \$2,750.00 |
| 01/26/2017 | DM | Review materials re [REDACTED]; prepare for and attend call with [REDACTED]; assess [REDACTED] issues; review correspondence/ email from Kumar. | 2.80 | \$725.00 | \$2,030.00 |
| 01/26/2017 | JP | Conference Call with [REDACTED] | 1.60 | \$425.00 | \$680.00 |
| 01/26/2017 | JL | Review documents and work on witness statements. Confer with clients. | 3.50 | \$550.00 | \$1,925.00 |
| 01/27/2017 | DM | Correspondence/ email exchanges re MHT doctor; draft correspondence/ email to Kumar; draft correspondence/ email to CP team; review multiple correspondence/ email from attorney Stammel; review materials from Stammel re Kumar, Melby and Obi; draft responsive correspondence/ email; confer CP; draft memoranda; review correspondence/ email from court filing system re pro hac for Couhig; review materials re ongoing representations by MHT that nurse's pay dependent on selling more licenses. | 3.00 | \$725.00 | \$2,175.00 |

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| 01/27/2017 | JL | Review client documents. Work on [REDACTED] | 2.30 | \$550.00 | \$1,265.00 |
| 01/27/2017 | RC | Meetings re lawsuit and causes of action. | 0.60 | \$775.00 | \$465.00 |
| 01/28/2017 | JP | Receive and review correspondence from Mr. Massey and [REDACTED] regarding lawsuit | 0.20 | \$425.00 | \$85.00 |
| 01/28/2017 | JP | Draft unsworn declaration for [REDACTED] | 1.60 | \$425.00 | \$680.00 |
| 01/29/2017 | DM | Review correspondence/ email from Ascentium counsel; review materials; assess [REDACTED]; review proposed declaration of [REDACTED]; draft memorandum; review proposed RICO complaint; draft memorandum and revisions. | 4.70 | \$725.00 | \$3,407.50 |
| 01/30/2017 | DM | Review correspondence/ email from Dr. Melby; confer Dr. Melby; draft correspondence/ email to Melby; review correspondence/ email from Kumar; draft memorandum; review correspondence/ email from attorney [REDACTED]; assess [REDACTED] issues; draft correspondence/ email to Josh Bennett re NDTX rules re contact with [REDACTED]; assess scope of declaration from [REDACTED]; assess same; draft memorandum; review correspondence/ email from Donnielle Green; draft memorandum; review materials re [REDACTED]; | 4.80 | \$725.00 | \$3,480.00 |
| 01/30/2017 | JP | Receive and review correspondence regarding supporting facts for complaints. | 0.40 | \$425.00 | \$170.00 |
| 01/30/2017 | JL | Review Ascentium response and attached documents. Work on statement for [REDACTED] Review [REDACTED] | 5.10 | \$550.00 | \$2,805.00 |
| 01/31/2017 | JP | Finalize Unsworn declaration and receive and review correspondence from clients and Mr. Massey regarding underlying facts of MHT scheme | 1.40 | \$425.00 | \$595.00 |
| 01/31/2017 | JP | Review notes from previous call with [REDACTED]; conference with [REDACTED], and begin drafting related declaration | 1.20 | \$425.00 | \$510.00 |
| 01/31/2017 | JL | Review doctor correspondences. Call to Dr. McCoy. | 0.60 | \$550.00 | \$330.00 |
| 01/31/2017 | DM | Review materials re Joe West and Brad Nurkin; assess rules re [REDACTED]; review correspondence/ email from Dr. Green; analysis of approach to addressing Ascentium; correspondence/ email to Dr. Green; review Melby materials; correspondence/ email to Dr. Priti Bhagia; review correspondence/ email from [REDACTED]; draft responsive correspondence/ email; confer CP team; review multiple correspondence/ email from [REDACTED]; assess impact of additional information; confer and analysis of possible approach to injunctive proceedings. | 3.70 | \$725.00 | \$2,682.50 |
| 02/01/2017 | JP | Receive and review correspondence and conference with Dr. Bhagia and Mr. Couhig [REDACTED] | 2.10 | \$425.00 | \$892.50 |

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| | | [REDACTED]; Conferences with Mr. Massey and Mr. Couhig regarding [REDACTED] [REDACTED] | | | |
| 02/01/2017 | DM | Review multiple correspondence/ email from Dr. Green [REDACTED] [REDACTED]; review correspondence/ email from [REDACTED] [REDACTED]; draft correspondence/ email; multiple conferences and multiple correspondence/ email exchanges re same; confer CP; call from [REDACTED] [REDACTED]; draft memorandum; confer; assess; review correspondence/ email exchanges; confer and coordinate; review multiple materials from [REDACTED]; investigate; call from [REDACTED]; confer. | 4.10 | \$725.00 | \$2,972.50 |
| 02/01/2017 | JL | Discussion with physician victim. | 0.60 | \$550.00 | \$330.00 |
| 02/01/2017 | RC | Conferences with Dr. Bhagia, Mr. Massey, and Mr. Pastorek. | 1.00 | \$775.00 | \$775.00 |
| 02/02/2017 | JP | Conference with [REDACTED] and Mr. Massey regarding Postle and MHT scheme; Drafting declarations and conferences with Mr. Couhig and Mr. Lemann regarding same; Conferences with [REDACTED], Mr. Massey, Mr. Lemann, and [REDACTED] underlying facts. | 7.40 | \$425.00 | \$3,145.00 |
| 02/02/2017 | DM | Review materials re [REDACTED]; multiple conferences CP; correspondence/ email exchanges re [REDACTED]; confer [REDACTED]; review correspondence/ email exchanges; assess status; call from [REDACTED]; assess and research [REDACTED]; confer CP; review materials re Hildago suit; review ACO issues; review [REDACTED] [REDACTED]; assess [REDACTED]; review correspondence/ email from Dr. Policarpo; draft responsive correspondence/ email; review correspondence/ email from Derek Melby; draft responsive correspondence/ email; | 5.20 | \$725.00 | \$3,770.00 |
| 02/02/2017 | JL | Confer with local counsel. Work on interviewing potential witnesses. Review MHT documents. Work on motion for injunction. | 5.20 | \$550.00 | \$2,860.00 |
| 02/02/2017 | RC | Conference with team. Review drafts. | 2.00 | \$775.00 | \$1,550.00 |
| 02/03/2017 | JP | Conferences and correspondence with [REDACTED], Mr. Couhig, and Mr. Massey about [REDACTED] [REDACTED]. | 3.90 | \$425.00 | \$1,657.50 |
| 02/03/2017 | DM | Review correspondence/ email from D.Green; ongoing review of MHT materials; confer CP re injunctive relief; [REDACTED] [REDACTED]; draft memorandum; confer Mr. Couhig; confer Texas counsel; coordinate TRO; confer; confer [REDACTED] [REDACTED]; multiple conferences re TRO and PI; review draft pleadings; draft memorandum; confer CP; review materials re [REDACTED]; [REDACTED]; review correspondence/ email from Dr. Obi; draft responsive correspondence/ email; review correspondence/ email from | 4.90 | \$725.00 | \$3,552.50 |

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| | | Dr. Green; draft responsive correspondence/ email; review correspondence/ email from Leon Carter re extension to Ascentium and McKenzie; draft memorandum; review correspondence/ email exchanges. | | | |
| 02/03/2017 | JL | Work on TRO motion. | 2.80 | \$550.00 | \$1,540.00 |
| 02/03/2017 | RC | Discussions with Massey re drafts. | 1.00 | \$775.00 | \$775.00 |
| 02/04/2017 | DM | Review materials re [REDACTED]; multiple conferences CP; correspondence/ email exchanges re [REDACTED]; confer [REDACTED]; review correspondence/ email exchanges; assess status; call from [REDACTED]; assess and research rules re contact; confer CP; review materials re Hildago suit; review ACO issues; review internet presence re ACO; assess injunction proof; review correspondence/ email from Dr. Policarpo; draft responsive correspondence/ email; review correspondence/ email from Derek Melby; draft responsive correspondence/ email; | 4.10 | \$725.00 | \$2,972.50 |
| 02/05/2017 | DM | Review correspondence/ email exchanges from TX counsel; analysis of TRO issues; confer; draft memorandum; review correspondence/ email from [REDACTED]; review correspondence/ email from [REDACTED]; review Declarations; assess status of [REDACTED] Declaration; confer re research on [REDACTED]. | 2.00 | \$725.00 | \$1,450.00 |
| 02/05/2017 | JP | Draft Declaration for [REDACTED] | 1.00 | \$425.00 | \$425.00 |
| 02/05/2017 | JP | Receive and review correspondence from [REDACTED] regarding [REDACTED]. | 0.20 | \$425.00 | \$85.00 |
| 02/06/2017 | JP | Correspondence with [REDACTED] regarding [REDACTED] and receive and review additional correspondences; Conferences with Mr. Lemann and Mr. Massey regarding witnesses and Receive and review related correspondence; Conference with [REDACTED] regarding underlying facts; Receive and review filed stipulation. | 1.40 | \$425.00 | \$595.00 |
| 02/06/2017 | DM | Review correspondence/ email from Dr. Kumar; draft responsive correspondence/ email; review correspondence/ email from Dr. Green; draft correspondence/ email in response; review correspondence/ email from [REDACTED]; assess statement; review correspondence/ email re [REDACTED]; draft memorandum; review correspondence/ email exchange with Dr. Kumar; confer re possible claims against MHT | 4.30 | \$725.00 | \$3,117.50 |
| 02/06/2017 | JL | Discussions with potential witnesses. | 3.70 | \$550.00 | \$2,035.00 |
| 02/07/2017 | DM | Review correspondence/ email from Dr. Latterman; confer; draft correspondence/ email to CP; review correspondence/ email re Dr. Khan; confer re PL/TRO; review correspondence/ email re [REDACTED]; review correspondence/ email re [REDACTED]; review materials re [REDACTED]. | 3.90 | \$725.00 | \$2,827.50 |

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| 02/07/2017 | JP | Conference with [REDACTED] regarding underlying facts; conferences with Messrs Lemann, Couhig, and Massey regarding underlying facts; edits to draft TRO, and draft memo regarding strategy | 2.10 | \$425.00 | \$892.50 |
| 02/07/2017 | JL | Work on declarants. Work on TRO. | 1.20 | \$550.00 | \$660.00 |
| 02/07/2017 | RC | Conference with team re lawsuit strategy. | 1.50 | \$775.00 | \$1,162.50 |
| 02/08/2017 | DM | Review draft PI/ TRO and related materials; confer CP; draft revisions and memoranda; call from Dr. Daniels brother/ lawyer; review correspondence/ email from Dr. Kumar; draft correspondence/ email re same; review multiple correspondence/ email re [REDACTED]; draft memorandum; review correspondence/ email from court re extension to MHT; review correspondence/ email exchange; review pleadings; review correspondence/ email re [REDACTED]; review correspondence/ email re [REDACTED]; | 4.40 | \$725.00 | \$3,190.00 |
| 02/08/2017 | JP | Conferences and correspondence with clients, potential clients and witnesses regarding underlying facts; edits to TRO and declarations. | 4.10 | \$425.00 | \$1,742.50 |
| 02/08/2017 | JL | Conference calls with clients and declarants. Work on TRO. | 3.10 | \$550.00 | \$1,705.00 |
| 02/09/2017 | DM | Multiple correspondence/ email with multiple former MHT fact witnesses [REDACTED] multiple correspondence/ email with Herrin; confer Herrin; confer counsel for Dr. Daniel; confer [REDACTED]; confer MDs; review multiple correspondence/ email re MDs; research [REDACTED] review EDLA case; review e-file notice re order on extension; review correspondence/ email from MDs; call from MDs; review Univest issues; assess TRO; review new documents; confer [REDACTED]; correspondence/ email to [REDACTED]; assess claims; coordinate investigation and filing of injunction. | 7.30 | \$725.00 | \$5,292.50 |
| 02/09/2017 | JP | Conferences and correspondence with [REDACTED], Mr. Massey, and Mr. Lemann regarding underlying facts; Edits to [REDACTED]. | 2.30 | \$425.00 | \$977.50 |
| 02/09/2017 | JL | Communicate with clients. Work on evidence for TRO motion. Work on TRO motion. Review MHT emails and correspondence. | 6.60 | \$550.00 | \$3,630.00 |
| 02/09/2017 | RC | Work on motion for TRO. | 2.50 | \$775.00 | \$1,937.50 |
| 02/10/2017 | DM | Draft correspondence/ email to attorney Rob Daniel; draft memorandum re finalizing TRO and related pleadings; analysis and confer re RICO complaint; review correspondence/ email from Dr. Alexander; confer Dr. Alexander; draft correspondence/ email; review subsequent correspondence/ email; review correspondence/ email from Dr. Khan; confer Dr. Khan; assess Khan issues; confer Dr. Hossan; draft correspondence/ email; confer; call from Dr. Latterman; confer; call from Univest President; draft memorandum; draft correspondence/ email re same; confer; | 5.80 | \$725.00 | \$4,205.00 |

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| | | review [REDACTED]; draft correspondence/ email; review materials re [REDACTED]; draft memorandum; correspondence/ email to [REDACTED]; review responsive correspondence/ email; draft correspondence/ email to [REDACTED]; review responsive correspondence/ email; review Declaration; review correspondence/ email from Dr. Kumar; review Declaration; | | | |
| 02/10/2017 | JP | Conference with Mr. Massey regarding witnesses; and correspondence with Mr. Massey, Mr. Lemann, and Dr. Roosevelt Daniel regarding strategy and [REDACTED]. | 1.30 | \$425.00 | \$552.50 |
| 02/10/2017 | JL | Work on TRO research. Work on obtaining affidavits. Work on the pleadings for the injunctive relief. Calls with local counsel. | 4.10 | \$550.00 | \$2,255.00 |
| 02/12/2017 | JL | Work on TRO. | 0.50 | \$550.00 | \$275.00 |
| 02/13/2017 | JP | Conference with Mr. Massey and correspondence with Mr. Bennett regarding draft pleadings | 0.40 | \$425.00 | \$170.00 |
| 02/13/2017 | JL | Work on motion for TRO. | 1.70 | \$550.00 | \$935.00 |
| 02/13/2017 | DM | Review [REDACTED] declaration and materials; assess revised draft TRO; assess declaration status; review correspondence/ email from Dallas local counsel; draft correspondence/ email re TRO and conference; draft memorandum; | 2.70 | \$725.00 | \$1,957.50 |
| 02/14/2017 | JP | Fact investigation into recently filed lawsuits and conference with Mr. Couhig regarding same; conference calls and legal research [REDACTED]. | 2.50 | \$425.00 | \$1,062.50 |
| 02/14/2017 | JL | Work on TRO/PI pleadings. | 4.30 | \$550.00 | \$2,365.00 |
| 02/14/2017 | DM | Confer Texas counsel; review correspondence/ email from [REDACTED] assess materials provided by [REDACTED]; assess claims; review TRO pleadings; draft revisions; assess local rules; multiple correspondence/ email with employment counsel; draft correspondence/ email re same. | 4.10 | \$725.00 | \$2,972.50 |
| 02/14/2017 | RC | Work on TRO. | 2.50 | \$775.00 | \$1,937.50 |
| 02/15/2017 | JP | Conference with Mr. Lemann and Mr. Grant regarding motions; Finalize motion for expedited discovery and edits to other motions; Draft letter to Ascentium, Prepare exhibits; Receive and review correspondence and edits from Mr. Bennett. | 3.20 | \$425.00 | \$1,360.00 |
| 02/15/2017 | CG | Legal research for and edits to TRO | 1.00 | \$390.00 | \$390.00 |
| 02/15/2017 | JL | Work on TRO pleading. Confer with declarants and work on declarations. Work on Motion to Expedite Discovery. Work on gathering and marking evidence. Coordinate with local counsel. | 6.70 | \$550.00 | \$3,685.00 |

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| 02/15/2017 | DM | Review draft TRO/PI; confer CP; review [REDACTED] materials and email; assess same; review multiple correspondence/ email exchanges with Dr. Policarpio; review multiple correspondence/ email from [REDACTED] review correspondence/ email and materials from Dr. Kahn; multiple correspondence/ email communications among counsel re TRO drafts and related issues; review correspondence/ email re revisions to Declarations; assess and confer. | 3.80 | \$725.00 | \$2,755.00 |
| 02/16/2017 | JP | Edits to Motion for TRO, Expedited Discovery, and Expedited Hearing | 2.10 | \$425.00 | \$892.50 |
| 02/16/2017 | JP | Edits to filings, conferences and correspondence with CP attorneys and clients regarding same | 1.70 | \$425.00 | \$722.50 |
| 02/16/2017 | JL | Work on TRO filing. | 6.20 | \$550.00 | \$3,410.00 |
| 02/16/2017 | DM | Review TRO drafts and multiple correspondence/ email; review Obi and Kumar correspondence and declarations; assess; review relief sought; draft correspondence/ email to defense counsel; call to defense counsel seeking to confer; review court filing info; draft correspondence/ email to Univest president; review correspondence/ email from Ascentium counsel; draft memorandum; draft correspondence/ email; assess materials. | 7.40 | \$725.00 | \$5,365.00 |
| 02/16/2017 | RC | Work on TRO application. | 1.70 | \$775.00 | \$1,317.50 |
| 02/17/2017 | JP | Finalize correspondence to Mr. Gregoire on behalf of Dr. Policarpio | 0.20 | \$425.00 | \$85.00 |
| 02/17/2017 | JL | Confer with clients and witnesses. Review documents from both. | 1.40 | \$550.00 | \$770.00 |
| 02/17/2017 | DM | Review correspondence/ email exchanges re Dr. Policarpio; confer; draft memorandum; review multiple correspondence/ email re clients; review Court order granting expedited hearing; draft memorandum; draft correspondence/ email to counsel representing doctors in other matters; assess Dr. Daniel status; multiple correspondence/ email exchanges re TRO; confer Houston physician counsel; review employment issues; confer attorney Herrin; correspondence/ email to [REDACTED] confer atty. Herrin. | 6.70 | \$725.00 | \$4,857.50 |
| 02/18/2017 | JP | Conferences with [REDACTED], and Massey regarding underlying facts; Review documents from clients and former employees; and Draft non-disclosure agreement | 1.70 | \$425.00 | \$722.50 |
| 02/18/2017 | DM | Review correspondence/ email from [REDACTED] confer CP; [REDACTED]; draft correspondence/ email; review CP comments; provide NDA template and revise; draft memorandum; draft correspondence/ email to [REDACTED]; draft correspondence/ email to Dr. Daniel; review materials and correspondence/ email from [REDACTED]; draft correspondence/ email; analysis of materials; draft correspondence/ email re same; call from [REDACTED]; confer CP; confer [REDACTED]; review correspondence/ email from | 5.10 | \$725.00 | \$3,697.50 |

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| | | Dr. Obi, and review Ho communication to MDs; assess; review correspondence/ email exchanges from Khan re [REDACTED]. | | | |
| 02/18/2017 | RC | Meetings re hearing strategy. | 1.50 | \$775.00 | \$1,162.50 |
| 02/19/2017 | DM | Review correspondence/ email from former MHT employee; confer. | 0.40 | \$725.00 | \$290.00 |
| 02/20/2017 | JP | Correspondence to [REDACTED] regarding document review and gather documents for further review. | 0.30 | \$425.00 | \$127.50 |
| 02/20/2017 | JP | Correspondence with [REDACTED] and Mr. Massey regarding document review. | 0.30 | \$425.00 | \$127.50 |
| 02/20/2017 | DM | Review correspondence/ email from Dr. Daniel's brother/ attorney, R. Daniel; review responsive correspondence/ email. | 1.00 | \$725.00 | \$725.00 |
| 02/21/2017 | DM | Review correspondence/ email from [REDACTED]; assess; review subsequent correspondence/ email from [REDACTED]. | 0.40 | \$725.00 | \$290.00 |
| 02/22/2017 | DM | Review correspondence/ email from Latterman re Univest bill; draft memorandum; draft correspondence/ email. | 0.30 | \$725.00 | \$217.50 |
| 02/23/2017 | JP | Conferences and correspondence with [REDACTED] regarding [REDACTED]. | 0.60 | \$425.00 | \$255.00 |
| 02/23/2017 | DM | Confer REC re contact from other counsel; review correspondence/ email from Bennett re potential new client; | 0.30 | \$725.00 | \$217.50 |
| 02/23/2017 | RC | Work on TRO. | 0.30 | \$775.00 | \$232.50 |
| 02/24/2017 | JP | Correspondence and conference with [REDACTED] regarding [REDACTED]. | 0.30 | \$425.00 | \$127.50 |
| 02/24/2017 | DM | Review correspondence/ email from Dr. Melby; confer; draft correspondence/ email to Melby. | 0.70 | \$725.00 | \$507.50 |
| 02/27/2017 | JP | Receive and review MHT responsive pleadings | 1.60 | \$425.00 | \$680.00 |
| 02/27/2017 | DM | Review correspondence/ email from court EFS; review MHT response to TRO and discovery motion; review Ascentium response to TRO and discovery motion; review Ascentium motion to dismiss; review Latterman correspondence/ email from Dr. Latterman.; review correspondence/ email Dr. Policarpio; draft responsive correspondence/ email; review correspondence/ email exchanges from class team; draft responsive correspondence/ email re TRO and discovery motion; confer [REDACTED]. | 5.10 | \$725.00 | \$3,697.50 |
| 02/28/2017 | DM | Analysis of RICO issues and benefits from possible RICO filing; review materials re TRO issues; assess and correspondence/ email re possible Declarations. | 6.30 | \$725.00 | \$4,567.50 |
| 03/01/2017 | JP | Conference with Mr. Couhig and correspondence with Mr. Massey and Dr. Alexander. | 0.30 | \$425.00 | \$127.50 |

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| 03/01/2017 | JP | Conference call with Mr. Massey regarding potential clients; Receive and review additional documents from Mr. Massey regarding underlying facts | 0.70 | \$425.00 | \$297.50 |
| 03/01/2017 | JL | Review Defendants filings and work on responses. | 1.60 | \$550.00 | \$880.00 |
| 03/01/2017 | DM | Review multiple correspondence/ email from PA client re [REDACTED]; confer; draft responsive correspondence/ email; coordinate meeting; confer Texas counsel; coordinate conference on 3/2 re reply brief; correspondence/ email to multiple potential fact witnesses ([REDACTED]; [REDACTED]) re Declarations; confer CP; assess prior discussions; review correspondence/ email exchanges; confer [REDACTED]; draft correspondence/ email re conference; assess factual allegations by Ascentium; confer; coordinate briefing/ Reply to TRO and discovery motion; confer doctor clients re issues and update; confer [REDACTED]; review correspondence/ email from [REDACTED] and revised Declaration; confer; review correspondence/ email from Dr. Kahn; draft proposed response to William Clements letter; confer former MHT employee [REDACTED] draft multiple correspondence/ email; | 7.10 | \$725.00 | \$5,147.50 |
| 03/01/2017 | RC | Conference with team. | 0.30 | \$775.00 | \$232.50 |
| 03/02/2017 | JP | Prepare letter to Univest; Review pleadings filed by Ascentium; Draft reply in Support of Motion for Expedite Discovery. | 5.30 | \$425.00 | \$2,252.50 |
| 03/02/2017 | JL | Work on declarations. Review filings by Defendants. | 2.20 | \$550.00 | \$1,210.00 |
| 03/02/2017 | DM | Review correspondence/ email from [REDACTED]; draft responsive correspondence/ email; review [REDACTED] Declaration; transmit to team; review and contrast with MHT briefing; assess same; review correspondence/ email exchanges re Univest issues; review materials from [REDACTED] assess issues; confer; draft memorandum; draft correspondence/ email; review pleadings re TRO; conference call with class counsel team re Reply Briefing; review correspondence/ email from [REDACTED]; confer; draft memorandum; incorporate [REDACTED] declaration revisions; call from [REDACTED]; review text messages from [REDACTED]; review Reply to expedited discovery; draft memorandum; coordinate briefing on TRO related pleadings. | 7.00 | \$725.00 | \$5,075.00 |
| 03/03/2017 | JP | Conferences with Mr. Lemann regarding TRO filing | 0.20 | \$425.00 | \$85.00 |
| 03/03/2017 | JL | Work on TRO reply. Work on declarations. | 1.80 | \$550.00 | \$990.00 |
| 03/03/2017 | DM | Correspondence/ email exchanges with [REDACTED]; confer CP; review correspondence/ email exchanges from Dallas counsel; draft memorandum; correspondence/ email exchanges with [REDACTED]; confer [REDACTED]; draft Declaration; confer; draft correspondence/ email; review materials re MHT finances; asses; confer REC re briefing; confer at length with [REDACTED]; confer [REDACTED]; confer TX counsel; review multiple correspondence/ email | 8.10 | \$725.00 | \$5,872.50 |

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| | | exchanges from clients, and review correspondence/ email from Dr. Ho; correspondence/ email to class team; confer REC; correspondence/ email to [REDACTED] correspondence/ email to [REDACTED]; draft memorandum. | | | |
| 03/03/2017 | RC | Confer with team re TRO submission. | 1.20 | \$775.00 | \$930.00 |
| 03/04/2017 | JP | Correspondence with Mr. Massey and Mr. Lemann regarding Reply and edits to Reply memoranda | 1.40 | \$425.00 | \$595.00 |
| 03/04/2017 | DM | Correspondence/ email exchanges with [REDACTED]; confer CP; review correspondence/ email exchanges from Dallas counsel; draft memorandum; correspondence/ email exchanges with [REDACTED]; confer [REDACTED]; draft Declaration; confer; draft correspondence/ email re same; confer; review reply briefing; revisions; assess status; confer and coordinate; confer [REDACTED]; draft correspondence/ email re [REDACTED]; confer and coordinate; assess [REDACTED] status; confer re [REDACTED]; draft correspondence/ email re [REDACTED]; confer. | 9.30 | \$725.00 | \$6,742.50 |
| 03/04/2017 | RC | Work on evidence for TRO. | 1.60 | \$775.00 | \$1,240.00 |
| 03/05/2017 | JP | Receive and review memoranda from Mr. Massey and Mr. Couhig and edits to same | 6.10 | \$425.00 | \$2,592.50 |
| 03/05/2017 | JL | Confer with [REDACTED] and work on obtaining a declaration from him. Work on TRO reply. | 2.00 | \$550.00 | \$1,100.00 |
| 03/05/2017 | DM | Review and revise class briefing; draft correspondence/ email to class counsel; multiple correspondence/ email exchanges with [REDACTED]; correspondence/ email with [REDACTED]; review correspondence/ email and Declaration/ attachments from [REDACTED]; correspondence/ email with Melby; analysis of Ascentium collection efforts with Policarpio and Melby; review correspondence/ email to Ascentium on behalf of various physicians; assess same; draft memorandum; review McKenzie MHT email exchange; multiple correspondence/ email exchanges. | 8.50 | \$725.00 | \$6,162.50 |
| 03/06/2017 | JP | Preparation of reply Memoranda for filing, including multiple conferences and correspondence with CP and Dallas counsel. | 5.30 | \$425.00 | \$2,252.50 |
| 03/06/2017 | JL | Work on RICO complaint. Work on reply to Ascentium's opposition to TRO application. | 5.80 | \$550.00 | \$3,190.00 |
| 03/07/2017 | JL | Interview witnesses and physicians. Work on RICO complaint. | 3.90 | \$550.00 | \$2,145.00 |
| 03/07/2017 | JP | Correspondence regarding multiple pending strategic issues. | 0.40 | \$425.00 | \$170.00 |
| 03/07/2017 | DM | Call from [REDACTED]; review correspondence/ email from [REDACTED]; confer CP; correspondence/ email exchange with Dr. Bhagia; confer Bhagia; review correspondence/ email and text exchanges from former MHT employees; draft responsive correspondence/ email/ text; draft memorandum; | 7.70 | \$725.00 | \$5,582.50 |

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| | | review and analysis RICO complaint; revisions; assess MHT bankruptcy possibility; | | | |
| 03/08/2017 | JL | Work on RICO complaint. | 4.60 | \$550.00 | \$2,530.00 |
| 03/08/2017 | DM | Revisions to RICO complaint; confer TX counsel (Crouch and Bennett); draft memorandum; confer MDs; review multiple correspondence/ email exchanges; assess status and strategy; assess strategy; confer [REDACTED] re MS doctor claims; assess same; review correspondence/ email from Dr. Bhagia; confer Dr. Green; confer Dr. Kumar. | 8.10 | \$725.00 | \$5,872.50 |
| 03/09/2017 | JL | Work on RICO complaint. Work on opposition to Ascentium's motions to dismiss. Communicate with various clients. | 3.80 | \$550.00 | \$2,090.00 |
| 03/09/2017 | JP | Review and draft memo regarding Motion to Dismiss; and conference with Dr. Blake Knutson of Tyler Texas about representation; and conference with Mr. Lemann regarding RICO complaint | 2.70 | \$425.00 | \$1,147.50 |
| 03/09/2017 | DM | Multiple conferences with MDs; Michigan counsel; call and correspondence/ email/ text messages from former MHT email; review, revise and analysis of RICO claim; multiple revisions; assess status of TRO; confer TX counsel. Assess Univest. | 6.30 | \$725.00 | \$4,567.50 |
| 03/10/2017 | JL | Confer with [REDACTED]. Work on opposing motion to dismiss by Ascentium. Work on draft of RICO complaint. Confer with Dr. Green. | 4.80 | \$550.00 | \$2,640.00 |
| 03/10/2017 | JP | Receive and review emails from Dr. Knutson; Conference with Mr. Lemann regarding RICO complaint; Conference with Mr. Naidu and correspondence regarding same; Review draft of RICO complaint. | 1.70 | \$425.00 | \$722.50 |
| 03/10/2017 | DM | Confer RICO complaint; revisions; assess scope of complaint issues and FRCP; assess consolidation issues; calls to MDs; review multiple correspondence/ email exchanges; draft multiple correspondence/ email re MDs, and related issues; confer TN counsel; confer MS counsel; multiple calls and correspondence/ email. | 5.10 | \$725.00 | \$3,697.50 |
| 03/12/2017 | DM | Review and revise RICO class complaint; assess [REDACTED]; analysis of claims; review Declarations; revise accordingly; review correspondence/ email/ text message from [REDACTED] re communications; | 3.30 | \$725.00 | \$2,392.50 |
| 03/13/2017 | JP | Correspondence updating clients and provide engagement letters, etc. to potential clients. | 0.40 | \$425.00 | \$170.00 |
| 03/13/2017 | DM | Defense counsel re possible agreement to accept service of RICO complaint; draft memorandum; review responsive correspondence/ email from physicians; calls from [REDACTED]; confer [REDACTED]; draft correspondence/ email re same; correspondence/ email [REDACTED] re text about [REDACTED]; draft memorandum; draft | 7.40 | \$725.00 | \$5,365.00 |

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| | | correspondence/ email to [REDACTED] review outline re motion to dismiss; draft correspondence/ email. | | | |
| 03/13/2017 | JL | Work on RICO complaint and ancillary filings. Work on 12b6 opposition. | 3.00 | \$550.00 | \$1,650.00 |
| 03/13/2017 | RC | Meeting re RICO lawsuit. | 1.00 | \$775.00 | \$775.00 |
| 03/14/2017 | JP | Correspondence with Mr. Lemann, Mr. Massey, and Mr. Fischbach regarding underlying facts and strategy | 0.30 | \$425.00 | \$127.50 |
| 03/14/2017 | JP | Meeting with Mr. Massey and [REDACTED] about [REDACTED] | 2.00 | \$425.00 | \$850.00 |
| 03/14/2017 | DM | Communications from [REDACTED]; communication from [REDACTED]; draft correspondence/ email to defense counsel; review and assess TRO opposition and [REDACTED]; evaluate and research [REDACTED]; prepare for meeting, and meet with [REDACTED]; draft memorandum; review correspondence/ email exchanges from Dr. Walker and Dr. Vecchia; confer; responsive correspondence/ email; review correspondence/ email re Motion to Dismiss; review correspondence/ email from MHT counsel re accepting service of RICO complaint; confer; draft memorandum; draft correspondence/ email; review. | 6.50 | \$725.00 | \$4,712.50 |
| 03/15/2017 | JP | Conferences and correspondence related to drafting motion to dismiss; Correspondence regarding waiver/acceptance form; draft and research [REDACTED]; conferences with new prospective clients. | 2.80 | \$425.00 | \$1,190.00 |
| 03/15/2017 | DM | Review correspondence/ email from AC lawyer; draft memorandum; draft responsive correspondence/ email; draft correspondence/ email to MI counsel; review correspondence/ email from MI counsel; review materials from Dr. Bhagia; confer Dr. Bhagia; draft correspondence/ email; review correspondence/ email from Dr. Knutsen; draft memorandum; draft responsive correspondence/ email; assess materials; correspondence/ email exchanges. | 5.30 | \$725.00 | \$3,842.50 |
| 03/15/2017 | JL | Work on opposition to motion to dismiss. | 1.40 | \$550.00 | \$770.00 |
| 03/16/2017 | JP | Research and review [REDACTED]; Conference with Mr. Clem regarding representation; Draft and provide documents to Dr. Baghia, Mr. Clem, and others. | 3.10 | \$425.00 | \$1,317.50 |
| 03/16/2017 | DM | Review correspondence/ email re physician inquiry; assess Ascentium/ Univest issues; confer; draft memorandum; review correspondence/ email from Dr. Knutsen re [REDACTED]; draft responsive correspondence/ email; review subsequent correspondence/ email; call from Dr. Kahn; review correspondence/ email from other (MI) counsel; confer consultant re action items; correspondence/ email exchange with TX counsel re Stammel on extension; draft letter to Stammel; review multiple correspondence/ email re physician inquiries; review correspondence/ email from Dr. Vecchia; review multiple correspondence/ email | 7.10 | \$725.00 | \$5,147.50 |

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| | | from Dr. Bhagia; draft responsive correspondence/ email; confer CP; review correspondence/ email from atty. Barron; draft responsive correspondence/ email and coordinate conference; review correspondence/ email from [REDACTED]; [REDACTED] draft memorandum; draft responsive correspondence/ email. | | | |
| 03/16/2017 | JL | Work on opposition to motion to dismiss. | 4.20 | \$550.00 | \$2,310.00 |
| 03/16/2017 | RC | Confer with team re negotiations and litigation strategy. | 1.10 | \$775.00 | \$852.50 |
| 03/17/2017 | JP | Field calls from new potential clients and related correspondence with Mr. Massey; Draft Declaratory Judgment section of opposition. | 5.30 | \$425.00 | \$2,252.50 |
| 03/17/2017 | DM | Confer attorney Kirsten Barron; draft correspondence/ email to attorney Barron; confer CP re oppositon to motion to dismiss by Ascentium; confer re TRO issues; review multiple correspondence/ email exchanges from [REDACTED]; address issues from [REDACTED] email; draft multiple correspondence/ email; review insert into oppositon brief re Ascentium motion to dismiss; draft correspondence/ email; mutiple conferences with MD class members; correspondence/ email exchanges; review correspondence/ email exchanges re PHV applications and orders; | 5.50 | \$725.00 | \$3,987.50 |
| 03/17/2017 | JL | Work on opposition to motion to dismiss. | 4.80 | \$550.00 | \$2,640.00 |
| 03/17/2017 | RC | Confer with team re opposition to motion to dismiss. | 0.70 | \$775.00 | \$542.50 |
| 03/18/2017 | JP | Receive and review edited motion to dismiss, add edits, and circulate. | 1.10 | \$425.00 | \$467.50 |
| 03/18/2017 | DM | Review and revise brief in opposition to Ascentium motion to dismiss; multiple correspondence/ email re same. | 2.30 | \$725.00 | \$1,667.50 |
| 03/19/2017 | DM | Review additional draft of opposition to Ascenitum motion to dismiss; draft correspondence/ email to team re same; re correspondence/ email from Dr. Della Vecchia re [REDACTED]; draft memorandum; review correspondence/ email from Dr. Knutsen re [REDACTED]; review correspondence/ email from Ascentium's counsel, Stammel requesting phone conference on 3/20/2017; subsequent correspondence/ email exchange with Stammel; communications with CP team. | 3.50 | \$725.00 | \$2,537.50 |
| 03/19/2017 | RC | Work on opposition to motion to dismiss. | 1.50 | \$775.00 | \$1,162.50 |
| 03/20/2017 | JP | Conference with Dr. Giarrizzi regarding [REDACTED]; Conference with Mr. Lemann regarding Opposition; Conference with Dr. Walpole and Dr. Sagel regarding representation; Edits to Opposition | 3.90 | \$425.00 | \$1,657.50 |
| 03/20/2017 | DM | Telephone conference with Ascentium counsel; review correspondence/ email re acceptance of service (MHT); review final draft of opposition to Ascentium motion to dismiss; draft correspondence/ email to [REDACTED]; review | 5.20 | \$725.00 | \$3,770.00 |

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| | | <p> [REDACTED]' materials; multiple correspondence/ email exchanges with MDs; confer re representation issues; correspondence/ email exchange with Dallas counsel; correspondence/ email from [REDACTED]; review attachments; assess [REDACTED]; review correspondence/ email from Court, and review final filed version of opposition to Ascentium motion to dismiss in Melby case; correspondence/ email with Michigan counsel; draft correspondence/ email to all counsel re distribution of pleadings to all counsel. </p> | | | |
| 03/20/2017 | JL | Work on opposition to motion to dismiss. Confer with potential client (Oklahoma). | 2.10 | \$550.00 | \$1,155.00 |
| 03/21/2017 | JP | Receive and review numerous correspondences from potential clients, clients, and Mr. Massey; Conferences with potential clients, including Dr. Sagel and Dr. Patel and related correspondence. | 2.60 | \$425.00 | \$1,105.00 |
| 03/21/2017 | CG | Legal Research re: [REDACTED]. | 1.30 | \$390.00 | \$507.00 |
| 03/21/2017 | DM | <p> Confer [REDACTED]; multiple calls from MDs; review multiple correspondence/ email exchanges from MDs; assess possible MHT asset freeze by Texas Workforce Commission; review correspondence/ email re [REDACTED] [REDACTED] [REDACTED] </p> | 6.10 | \$725.00 | \$4,422.50 |
| 03/22/2017 | JP | Numerous conferences and correspondences with clients, potential clients, Mr. Massey, Mr. Lemann, and Mr. Couhig regarding underlying facts and strategy; fact investigation regarding documents from clients and recordings provided. | 3.10 | \$425.00 | \$1,317.50 |
| 03/22/2017 | DM | <p> Research and analysis of [REDACTED]; confer TX counsel; review correspondence/ email exchanges with [REDACTED]; confer [REDACTED]; review [REDACTED]; review multiple correspondence/ email; draft correspondence/ email to Ascentium counsel; confer Latterman; review multiple text messages re Ascentium issues; draft correspondence/ email to Michigan counsel; draft correspondence/ email to Univest counsel; review responsive correspondence/ email; coordinate meetings with former MHT persons; draft legal memorandum re [REDACTED]; correspondence/ email exchange with Washington state counsel; review correspondence/ email from Ascentium counsel re ongoing discussions. </p> | 8.50 | \$725.00 | \$6,162.50 |
| 03/22/2017 | JL | Confer with potential clients and witnesses. | 0.50 | \$550.00 | \$275.00 |
| 03/22/2017 | RC | Meeting re litigation strategy. | 0.50 | \$775.00 | \$387.50 |
| 03/23/2017 | CG | Legal Research re: [REDACTED] | 0.50 | \$390.00 | \$195.00 |

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| 03/23/2017 | DM | Review correspondence/ email from Ascentium counsel; draft responsive correspondence/ email; review correspondence/ email re AC owner, Warburg Pincus; draft responsive correspondence/ email; review [REDACTED] materials; assess McKenzie issues; multiple correspondence/ email exchanges with MHT former employee; assess [REDACTED]; confer CP; correspondence/ email exchanges with MDs; confer re scope of representation; assess Univest issues; analysis of coordinate strategy re suits against Univest; review Univest materials; confer [REDACTED] | 8.10 | \$725.00 | \$5,872.50 |
| 03/23/2017 | JP | Correspondence and conferences with clients, potential clients, and Mr. Massey regarding underlying facts. | 2.10 | \$425.00 | \$892.50 |
| 03/23/2017 | JL | Work on class certification research and support. | 1.40 | \$550.00 | \$770.00 |
| 03/23/2017 | RC | Confer with Massey re expanding claims and multiple defendants. | 1.20 | \$775.00 | \$930.00 |
| 03/24/2017 | DM | Review multiple correspondence/ email and extensive materials from Michigan counsel; review correspondence/ email from Bexar county counsel to Dallas local counsel; confer CP team re Univest case; memoranda re declination of individual representation; correspondence/ email exchanges with AC counsel; assess Univest claims, coordinate approach; coordinate and multiple conferences re suit v. Univest and procedural issues; confer and coordinate with TX counsel re multiple issues and developments; confer and coordinate; multiple correspondence/ email from [REDACTED]; confer and correspondence/ email exchanges; review correspondence/ email from client; review correspondence/ email from San Antonio counsel; | 6.80 | \$725.00 | \$4,930.00 |
| 03/24/2017 | JP | Correspondence to [REDACTED] regarding [REDACTED] correspondence with clients and potential clients regarding strategy updates; Draft rejection letters and review recent correspondence and documents | 2.10 | \$425.00 | \$892.50 |
| 03/24/2017 | JL | Work on additional potential complaints. | 0.80 | \$550.00 | \$440.00 |
| 03/26/2017 | JP | Correspondence with Dr. Naidu regarding representation; and review complaints filed by Univest in Pennsylvania | 0.80 | \$425.00 | \$340.00 |
| 03/26/2017 | DM | Review multiple correspondence/ email exchanges from [REDACTED]; confer CP; review draft Bhagia suit versus Univest/ McKenzie and MHT/ Postle; review Ascentium-Univest agreement; draft memorandum; review correspondence/ email from JP; review multiple Univest suits; correspondence/ email to Dr. Bhagia; confer Bhagia; coordinate Bhagia suit; review correspondence/ email with Dr. Johnston; review correspondence/ email with Dr. Patel; review correspondence/ email from Bexar County counsel; review correspondence/ email from Dallas co-counsel; review correspondence/ email from Latterman and correspondence/ email with Latterman and Bexar County counsel; review correspondence/ email exchange with CP re Balboa; review correspondence/ email from Dr. Bhagia. | 7.70 | \$725.00 | \$5,582.50 |

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| 03/26/2017 | JL | Draft Univest Lawsuit. | 2.00 | \$550.00 | \$1,100.00 |
| 03/27/2017 | JP | Receive and review correspondence from Dr. Bhagia and conferences with Mr. Massey regarding underlying facts; Correspondence with [REDACTED] regarding representation; Conference with Dr. Sagel and related conferences and correspondence with [REDACTED] and Mr. Lemann regarding representation and fact investigation. | 1.30 | \$425.00 | \$552.50 |
| 03/27/2017 | DM | Multiple correspondence/ email exchanges re Univest suit; review Univest materials; review drafts of suit; revisions; confer Dr. Bhagia; confer Mr. Gometra; assess status; confer and correspondence/ email TX counsel; assess [REDACTED] emails and status; coordinate suit filing; review correspondence/ email exchanges with Dr. Nadiu. | 6.50 | \$725.00 | \$4,712.50 |
| 03/27/2017 | JL | Work on Univest complaint. | 2.30 | \$550.00 | \$1,265.00 |
| 03/28/2017 | JP | Receive and review correspondence from potential clients; Conferences with Dr. Asadi and with Mr. Lemann and Mr. Massey regarding MHT scheme and underlying facts. | 2.20 | \$425.00 | \$935.00 |
| 03/28/2017 | DM | Call with [REDACTED]; review multiple correspondence/ email and materials; correspondence/ email from Policarpio; confer and coordinate; draft memorandum; review pleadings re Univest; draft correspondence/ email; review Univest pleadings; confer and correspondence/ email re [REDACTED]; assess status of meetings; confer [REDACTED]; draft memorandum and review responsive CP memorandum; review multiple correspondence/ email re Policarpio; correspondence/ email exchanges with Dr. Sagel; confer Dr. Sagel; review subsequent correspondence/ email; call with Policarpio; call with CP team; review correspondence/ email exchange re Univest/ Bhagia; confer; review correspondence/ email re Dr. Asadi. | 7.10 | \$725.00 | \$5,147.50 |
| 03/28/2017 | JL | Work on interviewing potential clients and work on fact witness interviews. Review [REDACTED] emails and documents. | 1.90 | \$550.00 | \$1,045.00 |
| 03/29/2017 | JP | Correspondence with Dr. Elliott regarding representation, as well as additional correspondences with potential clients and review of correspondences and documents. | 2.20 | \$425.00 | \$935.00 |
| 03/29/2017 | DM | Review multiple correspondence/ email exchanges from multiple MDs re Univest related issues; draft memoranda and confer CP; call from [REDACTED]; review correspondence/ email and materials from [REDACTED]; extensive materials review; extensive review and confer re Univest issues. | 4.20 | \$725.00 | \$3,045.00 |
| 03/29/2017 | JL | Confer with potential client and fact witness. Work on fact investigation. | 1.60 | \$550.00 | \$880.00 |
| 03/29/2017 | RC | Meeting re litigation strategy. | 0.60 | \$775.00 | \$465.00 |
| 03/30/2017 | JP | Emails w Mr. Bennett and Mr. Massey regarding potential filings; correspondence with Dr. Orendorff regarding | 6.10 | \$425.00 | \$2,592.50 |

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| | | representation; conferences and correspondence with numerous clients and potential clients regarding Univest lawsuits | | | |
| 03/30/2017 | DM | Correspondence/ email exchanges re Baird, Odendorff, and Bhagia; review PACER materials re Univest; confer Kirsten Barron (Wash); confer Eric De Leon (Bexar County); confer [REDACTED]; review multiple materials re transactions among MHT and AC; review AC-Univest Broker Agreement; confer MHT counsel, Arnold; draft correspondence/ email to MHT counsel demanding defense, indemnity and hold harmless from Univest suits; correspondence/ email to clients re same; draft correspondence/ email to AC counsel handling defense, indemnity and hold harmless from Univest suits; correspondence/ email to clients re same; multiple subsequent correspondence/ email exchanges; correspondence/ email to AC counsel under Rule 408; multiple correspondence/ email exchanges among physicians re PA litigation; draft memorandum; draft correspondence/ email; correspondence/ email exchange with our team re settlement negotiations; coordinate strategy. | 7.80 | \$725.00 | \$5,655.00 |
| 03/30/2017 | JL | Work on TRO motions in newer suits. | 1.60 | \$550.00 | \$880.00 |
| 03/31/2017 | JP | Conferences and correspondence with numerous clients and potential clients as well as Mr. Massey, Mr. Elliott, and Mr. Couhig about strategy and underlying facts. | 4.10 | \$425.00 | \$1,742.50 |
| 03/31/2017 | DM | Mutiple calls with former MHT employees, MDs; review multiple materials; confer re possible MHT bankruptcy; assess issues; draft memorandum; review multiple correspondence/ email exchanges re Univest issues; assess issues; analysis and confer; multiple correspondence/ email on various issues. | 6.30 | \$725.00 | \$4,567.50 |
| 03/31/2017 | RC | Meeting re litigation strategy. | 0.60 | \$775.00 | \$465.00 |
| 04/01/2017 | DM | Review multiple correspondence/ email exchanges re possible additional lawsuits; draft memoranda; draft correspondence/ email re same; review multiple MHT materials; confer [REDACTED] re former MHT employees. | 3.80 | \$725.00 | \$2,755.00 |
| 04/02/2017 | DM | Review multiple subsequent materials from [REDACTED]; draft multiple correspondence/ email; coordinate strategy re additional possible lawsuits and possible MHT bankruptcy; call from MD; draft memorandum; confer CP. | 4.10 | \$725.00 | \$2,972.50 |
| 04/02/2017 | JL | Confer with co-counsel regarding potential MHT bankruptcy. | 0.50 | \$550.00 | \$275.00 |
| 04/02/2017 | RC | Meeting re litigation strategy and impact of bankruptcy. | 0.50 | \$775.00 | \$387.50 |
| 04/03/2017 | DM | Call from Dr. Duhaney; multiple correspondence/ email from multiple physicians; review correspondence/ email from MHT former employee; coordinate meeting; review multiple materials from MHT former employee; draft memorandum; confer MHT team CP; draft correspondence/ email to TX team counsel; review responsive correspondence/ email; | 5.70 | \$725.00 | \$4,132.50 |

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| | | review correspondence/ email exchange with [REDACTED]; calls with [REDACTED]; assess materials; review correspondence/ email from Dr. Latterman; review correspondence/ email from Dr. Obi; correspondence/ email exchanges with Dr. Patel; review correspondence/ email from Dr. Lubbos, and draft responsive correspondence/ email; correspondence/ email from Dr. Butt; review correspondence/ email exchange; analysis of claims; review correspondence/ email from Dr. Lartchenko; confer; continued review of MHT materials. | | | |
| 04/03/2017 | JP | Correspondence with numerous clients regarding strategy and facts and potential clients regarding representation | 2.00 | \$425.00 | \$850.00 |
| 04/03/2017 | JL | Review materials from [REDACTED] Confer with clients. | 0.90 | \$550.00 | \$495.00 |
| 04/04/2017 | JP | Receive and review correspondence from potential clients | 0.90 | \$425.00 | \$382.50 |
| 04/04/2017 | DM | Review correspondence/ email from multiple MDs; draft correspondence/ email from Lubbos; draft correspondence/ email; review correspondence/ email from Dr. Buras; draft correspondence/ email; review materials from [REDACTED]; confer [REDACTED]; draft correspondence/ email to AC counsel re FRE 408 conference; draft memorandum; review correspondence/ email from [REDACTED]; draft correspondence/ email; assess status of Latterman et al; review correspondence/ email from Dr. Latterman; draft correspondence/ email; confer; review multiple correspondence/ email exchanges re PA Univest suits; review correspondence/ email re Dr. Bhagia; confer Latterman. | 4.20 | \$725.00 | \$3,045.00 |
| 04/04/2017 | JL | Confer with potential clients and fact witnesses. | 1.70 | \$550.00 | \$935.00 |
| 04/04/2017 | RC | Meeting re coordinating various lawsuits. | 0.80 | \$775.00 | \$620.00 |
| 04/05/2017 | JP | Receive and review correspondence and contact potential clients regarding representation | 1.60 | \$425.00 | \$680.00 |
| 04/05/2017 | DM | Review multiple correspondence/ email; review correspondence/ email from multiple physicians; draft responsive correspondence/ email; review materials re Kahn counsel-PA; draft correspondence/ email to Kahn; review responsive correspondence/ email; draft multiple correspondence/ email; review correspondence/ email from PA counsel re multiple Univest claims; review materials re same; review correspondence/ email re Dr. Buras; draft memorandum; confer and correspondence/ email with past MHT employee; review MHT materials; correspondence/ email exchange with AC counsel re settlement discussion; confer; review correspondence/ email among Dr. Bhagia and PA counsel; review correspondence/ email exchange with Dr. Rettig; confer [REDACTED]. | 5.10 | \$725.00 | \$3,697.50 |
| 04/05/2017 | JL | Review [REDACTED] documents. Confer with potential clients. | 0.80 | \$550.00 | \$440.00 |
| 04/06/2017 | JP | Review recent correspondence and documents from Dr. Patel. | 0.50 | \$425.00 | \$212.50 |

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| 04/06/2017 | JP | Conferences and correspondence with numerous clients and potential clients. | 1.60 | \$425.00 | \$680.00 |
| 04/06/2017 | DM | review multiple correspondence/ email exchanges with PA clients; draft memorandum; draft correspondence/ email; confer PA counsel; review materials from [REDACTED]; assess Balboa money flow issues and McKenzie role (confirm); assess evidence; multiple confer and correspondence/ email with [REDACTED] | 5.30 | \$725.00 | \$3,842.50 |
| 04/06/2017 | JL | Confer with counsel regarding interviews and fact investigation. | 0.60 | \$550.00 | \$330.00 |
| 04/07/2017 | JP | Correspondence with numerous clients regarding strategy and facts and potential clients regarding representation; review consolidation motions | 0.80 | \$425.00 | \$340.00 |
| 04/07/2017 | DM | Review correspondence/ email from Court; review notices of related cases, and no objection (Melby); review multiple correspondence/ email from multiple physicians; confer; review correspondence/ email exchange with Dr. Florian; review correspondence/ email exchange with Dr. Thornton; review correspondence/ email from former MHT employee [REDACTED]; draft responsive correspondence/ email; review correspondence/ email from Policarpio; review correspondence/ email from Latterman; draft responsive correspondence/ email; review memorandum re call from Dr. Ho; draft memorandum; review consolidation pleadings from TX counsel. | 4.60 | \$725.00 | \$3,335.00 |
| 04/08/2017 | DM | Multiple calls and correspondence/ email from PA docs re Univest suits, counsel selection, as well as correspondence/ email re Jamal Lone lawyer meeting; confer; review subsequent correspondence/ email; call from [REDACTED]; review correspondence/ email. | 3.30 | \$725.00 | \$2,392.50 |
| 04/09/2017 | DM | Call with [REDACTED]; draft memorandum; review text messages; review correspondence/ email from Policarpio; draft responsive correspondence/ email; review correspondence/ email from Latterman; draft memorandum; confer and coordinate team meeting. | 3.70 | \$725.00 | \$2,682.50 |
| 04/10/2017 | JP | Correspondences and conferences with numerous clients regarding strategy and facts and potential clients regarding representation | 3.60 | \$425.00 | \$1,530.00 |
| 04/10/2017 | DM | Multiple calls and correspondence/ email from PA docs re Univest suits; responsive correspondence/ email; prepare for and attend team meeting; assess issues central to service, FRE 408 conference with AC counsel and reps; coordinate strategy and approach; review Order and pleadings re consolidation of cases; confer attorney Stallings; review materials; confer CP re coordination of multiple issues, strategy and related issues; call to TX counsel; draft correspondence/ email; multiple subsequent correspondence/ email; correspondence/ email with PA docs; prepare for and attend conference call with PA/ Univest sued docs; review | 7.20 | \$725.00 | \$5,220.00 |

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| | | multiple additional correspondence/ email; review correspondence/ email from Court re transfer issues; correspondence/ email exchanges with Stammel re meeting on 4/25 in Houston; confer CP; coordinate. | | | |
| 04/10/2017 | CG | Legal Research [REDACTED] | 0.80 | \$390.00 | \$312.00 |
| 04/11/2017 | JP | Correspondence with Mr. Orendorff and Ms. Latterman regarding [REDACTED]; Other correspondences and conferences with class members regarding representation | 5.20 | \$425.00 | \$2,210.00 |
| 04/11/2017 | DM | Review correspondence/ email from [REDACTED]; confer CP; assess MHT materials; [REDACTED]; confer CP re direct representation clients; draft correspondence/ email to [REDACTED]; review responsive correspondence/ email; confer re [REDACTED]; review correspondence/ email from Dr. Odenoff; confer JP; assess AC documents; confer CP re AC FRE 408 meeting; | 5.80 | \$725.00 | \$4,205.00 |
| 04/11/2017 | JL | Confer with potential client and fact witness. | 0.10 | \$550.00 | \$55.00 |
| 04/11/2017 | RC | Meetings on litigation strategy. | 0.80 | \$775.00 | \$620.00 |
| 04/12/2017 | JP | Correspondence and conferences with class members and related fact investigation regarding underlying facts | 4.60 | \$425.00 | \$1,955.00 |
| 04/12/2017 | DM | [REDACTED]; confer JP re [REDACTED]; confer Crouch; draft memorandum; confer former MHT employee; review correspondence/ email from Carter, and review communication for PA Univest counsel; confer Univest counsel; draft memorandum; confer re multiple MD claims and multiple correspondence/ email; confer team; draft correspondence/ email. | 5.60 | \$725.00 | \$4,060.00 |
| 04/12/2017 | CG | Legal research [REDACTED] | 1.20 | \$390.00 | \$468.00 |
| 04/12/2017 | JL | Confer with potential clients/witnesses. Review [REDACTED] materials. Research to [REDACTED] | 3.10 | \$550.00 | \$1,705.00 |
| 04/13/2017 | JP | Conference with Dr. Alemany regarding representation; Draft Waiver form for Univest lawsuit; Correspondence and conferences with class members regarding underlying facts | 1.90 | \$425.00 | \$807.50 |
| 04/13/2017 | DM | Review correspondence/ email re new public information and articles about AC and MHT scheme; confer [REDACTED]; assess [REDACTED] issues; [REDACTED]; review voluminous materials re AC meeting; confer CP; assess Univest issues and status; review multiple correspondence/ email re same; review correspondence/ email and waiver re Univest; review correspondence/ email from DeLeon; draft memorandum; draft correspondence/ email to DeLeon; inquiry re [REDACTED]; [REDACTED]; draft memorandum; draft correspondence/ email; draft correspondence/ email to Stammel; draft memorandum; review Univest waiver; | 5.30 | \$725.00 | \$3,842.50 |

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| 04/13/2017 | JL | Confer with potential client/witness. Review [REDACTED] materials. Work on research. | 1.60 | \$550.00 | \$880.00 |
| 04/13/2017 | RC | Work on amended complaint. | 0.80 | \$775.00 | \$620.00 |
| 04/14/2017 | JP | Document review in preparation for meeting with [REDACTED] | 3.60 | \$425.00 | \$1,530.00 |
| 04/14/2017 | DM | Review multiple MHT/ AC records, confer and coordinate AC presentation on 4/26; draft memorandum; review correspondence/ email exchanges from MDs; review correspondence/ email from Court, and review Court order on multiple issues; assess; confer CP; | 3.70 | \$725.00 | \$2,682.50 |
| 04/14/2017 | RC | Review court order and internal meetings. | 1.10 | \$775.00 | \$852.50 |
| 04/16/2017 | DM | Texts, correspondence/ email from clients; confer CP; correspondence/ email exchanges re status communication to clients; assess same. | 0.80 | \$725.00 | \$580.00 |
| 04/17/2017 | JP | Receive and review Orders and conference with Mr. Couhig regarding same; Conference with Dr. Patel regarding [REDACTED] | 0.40 | \$425.00 | \$170.00 |
| 04/17/2017 | DM | Confer CP team; review multiple correspondence/ email exchanges; confer [REDACTED]; confer Josh Bennett; assess materials; draft memorandum; | 0.70 | \$725.00 | \$507.50 |
| 04/18/2017 | JP | Conference with Mr. Lemann regarding strategy; Receive, review, and respond to correspondence from Dr. Bhagia regarding [REDACTED]; and correspondence with Mr. Massey regarding documents received | 1.00 | \$425.00 | \$425.00 |
| 04/18/2017 | DM | Review correspondence/ email from [REDACTED]; assess [REDACTED]; confer [REDACTED]; confer CP team; subsequent correspondence/ email exchanges; draft memorandum; review correspondence/ email from MDs; draft memorandum; assess; coordinate discussions; assess. | 2.10 | \$725.00 | \$1,522.50 |
| 04/18/2017 | JL | Work on amended global complaint and confer with co-counsel re same. | 2.20 | \$550.00 | \$1,210.00 |
| 04/18/2017 | RC | Confer with team re global complaint. | 0.30 | \$775.00 | \$232.50 |
| 04/19/2017 | JP | Create Powerpoint and review documents for same to present at negotiations; conferences with Mr. Lemann regarding strategy and [REDACTED] | 5.50 | \$425.00 | \$2,337.50 |
| 04/19/2017 | DM | Confer PA counsel; confer CP; confer Crouch; review multiple correspondence/ email from [REDACTED]; draft correspondence/ email; review multiple materials; confer [REDACTED]; confer CP; review multiple correspondence/ email [REDACTED]; confer [REDACTED]; review subsequent correspondence/ email from [REDACTED]; draft memorandum; review extensive materials; confer [REDACTED]; confer CP; review subsequent materials; draft correspondence/ email; review correspondence/ email to named plaintiffs; review multiple correspondence/ email from Dr. Bhagia; | 5.70 | \$725.00 | \$4,132.50 |

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| 04/19/2017 | JL | Draft correspondences to clients and work on global amended complaint. | 1.80 | \$550.00 | \$990.00 |
| 04/20/2017 | JP | Prepare PowerPoint, Document review for PowerPoint | 4.70 | \$425.00 | \$1,997.50 |
| 04/20/2017 | DM | Review correspondence/ email from [REDACTED]; review multiple materials; multiple correspondence/ email exchanges with CP; review materials from Dr. J. Patel; review materials; review correspondence/ email from Dr. Latterman; draft correspondence/ email; review subsequent [REDACTED] materials; | 4.20 | \$725.00 | \$3,045.00 |
| 04/20/2017 | JL | Review client documents and work on amended global complaint; and conferences with clients | 4.70 | \$550.00 | \$2,585.00 |
| 04/20/2017 | RC | Discussions with Massey re [REDACTED] materials. | 0.30 | \$775.00 | \$232.50 |
| 04/21/2017 | JP | Receive and review documents from clients; work on PowerPoint. | 6.20 | \$425.00 | \$2,635.00 |
| 04/21/2017 | DM | Review multiple materials re MHT/ AC/ Univest/ Balboa; confer CP; review PPT presentation; prepare for meeting with AC; multiple conferences; confer attorney De Leon; | 3.90 | \$725.00 | \$2,827.50 |
| 04/21/2017 | CG | Legal Research [REDACTED] | 2.20 | \$390.00 | \$858.00 |
| 04/21/2017 | JL | Conference call with Dr. Patel. Review Patel timeline and documents. Confer with Josh Bennett. Work on global complaint. Work on Ascentium presentation. | 3.80 | \$550.00 | \$2,090.00 |
| 04/21/2017 | RC | Prepare for AC meeting. | 1.00 | \$775.00 | \$775.00 |
| 04/23/2017 | JP | Conference with Mr. Massey and Edits to PowerPoint Presentation | 3.00 | \$425.00 | \$1,275.00 |
| 04/23/2017 | DM | Review and revisions to PPT; confer CP; assess and draft outline for meeting and ultimately master complaint issues; review correspondence/ email from Latterman; draft responsive correspondence/ email; | 3.60 | \$725.00 | \$2,610.00 |
| 04/23/2017 | CG | Legal Research [REDACTED] | 1.00 | \$390.00 | \$390.00 |
| 04/23/2017 | RC | Prepare for AC meeting. | 1.00 | \$775.00 | \$775.00 |
| 04/24/2017 | JP | Conference with Mr. Couhig regarding Ascentium presentation; Fact investigation and preparation for presentation to Ascentium | 2.70 | \$425.00 | \$1,147.50 |
| 04/24/2017 | DM | prepare for meeting with AC; review multiple materials; confer and review correspondence/ email/ texts re [REDACTED]; coverage, MHT employees and multiple issues; review final PPT; review correspondence/ email from AC counsel and responsive correspondence/ email; review research [REDACTED]; review correspondence/ email from Dr. Buras; review correspondence/ email from [REDACTED]; review correspondence/ email/ text from [REDACTED]; | 3.90 | \$725.00 | \$2,827.50 |

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| 04/24/2017 | JL | Work on Ascentium presentation and legal research [REDACTED] Telephone conference with Dr. Melby. Review of Melby materials. Telephone conference with Dr. Kumar and review of Kumar materials. Confer with potential witnesses and clients. | 5.50 | \$550.00 | \$3,025.00 |
| 04/24/2017 | RC | Conference with team regarding MHT presentation. | 1.00 | \$775.00 | \$775.00 |
| 04/25/2017 | JP | Correspondence and conferences with Mr. Massey regarding presentation, with clients regarding underlying facts, and fact investigation regarding same; Review additional documents from [REDACTED]. | 2.40 | \$425.00 | \$1,020.00 |
| 04/25/2017 | DM | Prepare for, travel to and attend AC meeting; return travel; multiple conferences with former MHT employees; confer TX co-counsel; confer CP; coordinate joint motion for extension to file master complaint; assess legal research. | 9.70 | \$725.00 | \$7,032.50 |
| 04/25/2017 | JL | Work on amended complaint. Interview potential clients and witnesses. Telephone conference with Dr. Policarpio. Review correspondence forwarded from clients. | 4.60 | \$550.00 | \$2,530.00 |
| 04/25/2017 | RC | Meeting with team re Amended complaint and AC meeting. | 2.00 | \$775.00 | \$1,550.00 |
| 04/26/2017 | JP | Correspondence and conferences with [REDACTED] and Mr. Lemann regarding underlying facts; and correspondence with clients regarding strategy and case updates, and with potential clients regarding representation; Conference with Dr. Khan and correspondence regarding representation. | 1.70 | \$425.00 | \$722.50 |
| 04/26/2017 | DM | Review correspondence/ email re multiple MDs and practices; assess same; review research; draft correspondence/ email to AC counsel re extension on Master Complaint; confer CP; draft memorandum; confer [REDACTED] confer re [REDACTED] | 1.30 | \$725.00 | \$942.50 |
| 04/26/2017 | JL | Work on amended complaint. | 1.50 | \$550.00 | \$825.00 |
| 04/26/2017 | RC | Confer re strategy for negotiations and complaint | 0.30 | \$775.00 | \$232.50 |
| 04/27/2017 | JP | Begin drafting Joint Motion to Extend Deadlines; Draft letter on behalf of Dr. Patel [REDACTED]. | 1.20 | \$425.00 | \$510.00 |
| 04/27/2017 | DM | Review multiple correspondence/ email exchanges; review materials re Patel and Balboa; review materials re Lartencheko; confer; draft memorandum; review Dallas petitions; confer CP; review materials from [REDACTED] | 2.20 | \$725.00 | \$1,595.00 |
| 04/27/2017 | JL | Work on global complaint and joint motion to extend filing of same. | 5.10 | \$550.00 | \$2,805.00 |
| 04/28/2017 | JP | Draft letter on behalf of Dr. Butt contesting loan; Review documents for Mr. Lemann regarding allegations for Amended Complaint. | 1.10 | \$425.00 | \$467.50 |
| 04/28/2017 | DM | Multiple conferences and correspondence/ email re Motion for Ext on Master Complaint; confer and coordinate with AC counsel; address agreement/ consent by MHT counsel; confer | 2.00 | \$725.00 | \$1,450.00 |

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| | | CP and Tx counsel team; address extension; review correspondence/ email from court filing system; review proposed order, confer CP. | | | |
| 04/28/2017 | JL | Confer with Dr. Green. Work on amended complaint and motion for extension. | 4.40 | \$550.00 | \$2,420.00 |
| 04/28/2017 | RC | Conference call re settlement discussions and amendment. | 0.80 | \$775.00 | \$620.00 |
| 04/29/2017 | DM | Review multiple correspondence/ email exchanges; review texts from [REDACTED]; prepare for and attend call with former MHT employee [REDACTED]. | 2.20 | \$725.00 | \$1,595.00 |
| 04/30/2017 | DM | Review materials; draft memorandum re [REDACTED]; review correspondence/ email/ text re [REDACTED]; draft correspondence/ email; review materials re Dr. Melby recommendations re BR; draft correspondence/ email; | 1.20 | \$725.00 | \$870.00 |
| 05/01/2017 | JP | Correspondences with Dr. Patel regarding individual lawsuit; Correspondences with Mr. Lemann and Mr. Massey regarding pending issues, including amended complaint; Conference with Mr. Couhig regarding creation of settlement matrix | 0.70 | \$425.00 | \$297.50 |
| 05/01/2017 | DM | Confer CP re AC discussions and matrix; review correspondence/ email from Dr. Bhagia; review correspondence/ email from Court re extension of time; call from Texas lawyer; call from Arizona physician group; draft memorandum; confer CP re status of [REDACTED] and AC/ MHT timeline 2013-2014; review text message from [REDACTED]; correspondence/ email re same; review correspondence/ email from [REDACTED]; draft correspondence/ email re same; review correspondence/ email from Dr. Patel. | 3.60 | \$725.00 | \$2,610.00 |
| 05/01/2017 | JL | Review materials from [REDACTED] Work with Dr. Green on her factual background. Review Court order. Work on amended complaint. | 2.70 | \$550.00 | \$1,485.00 |
| 05/01/2017 | RC | Work on settlement matrix. | 1.00 | \$775.00 | \$775.00 |
| 05/02/2017 | JP | Draft update correspondence to clients; correspondence with potential clients regarding representation; draft settlement matrix; conference with Mr. Chaurasia regarding [REDACTED]. | 3.50 | \$425.00 | \$1,487.50 |
| 05/02/2017 | DM | Confer Crouch re status and strategy; confer Dr. Latterman; review correspondence/ email from MDs; call from counsel in Fort Worth; multiple correspondence/ email exchanges; review AC materials. | 3.30 | \$725.00 | \$2,392.50 |
| 05/02/2017 | JL | Work on amended complaint. | 1.00 | \$550.00 | \$550.00 |
| 05/03/2017 | DM | Calls, texts and email from [REDACTED] re new business entity by Dr. Ho, Fronk, et al; confer [REDACTED]; review correspondence/ email from MDs; calls from MDs; confer CP; draft correspondence/ email to AC counsel re status. | 5.00 | \$725.00 | \$3,625.00 |

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| 05/04/2017 | JP | Conference with Dr. Pachori regarding representation, and correspondence with clients regarding case update. | 0.50 | \$425.00 | \$212.50 |
| 05/04/2017 | DM | Confer CP.; review correspondence/ email from Dr. Melby re [REDACTED]; review correspondence/ email re new MHT program; review multiple correspondence/ email exchanges; | 1.00 | \$725.00 | \$725.00 |
| 05/04/2017 | JL | Work on amended complaint. | 0.80 | \$550.00 | \$440.00 |
| 05/04/2017 | RC | Work on settlement negotiations. | 1.00 | \$775.00 | \$775.00 |
| 05/05/2017 | JP | Conferences with potential clients regarding representation | 0.80 | \$425.00 | \$340.00 |
| 05/05/2017 | DM | Calls from MDs re status and strategy; review correspondence/ email re Dr. Imran; review correspondence/ email exchange re Dr. Ortega; | 0.80 | \$725.00 | \$580.00 |
| 05/06/2017 | DM | Review correspondence/ email from Stammel; review status of consolidated master complaint; multiple correspondence/ email; | 0.60 | \$725.00 | \$435.00 |
| 05/07/2017 | DM | Review correspondence/ email re [REDACTED] materials; draft correspondence/ email; review [REDACTED] materials; review multiple materials re Dr. Ho et al effort to restart MHT program under new entity | 1.80 | \$725.00 | \$1,305.00 |
| 05/08/2017 | JP | Correspondence with clients about [REDACTED] | 0.30 | \$425.00 | \$127.50 |
| 05/08/2017 | DM | Review correspondence/ email from [REDACTED]; review [REDACTED]; confer; review correspondence/ email from TX counsel, and draft responsive correspondence/ email; review correspondence/ email from Dr. Latterman; review correspondence/ email from Dr. Melby; draft responsive correspondence/ email; | 1.70 | \$725.00 | \$1,232.50 |
| 05/08/2017 | JL | Work on complaint. | 1.30 | \$550.00 | \$715.00 |
| 05/09/2017 | JP | Conference with Mr. Massey and correspondence with Mr. Orendorff about representation. | 0.40 | \$425.00 | \$170.00 |
| 05/09/2017 | DM | Review correspondence/ email from [REDACTED] re materials; review materials and correspondence/ email re Ho conference call with clients and comments re Balboa; review correspondence/ email from CP; | 2.10 | \$725.00 | \$1,522.50 |
| 05/09/2017 | JL | Work on amended complaint. | 3.10 | \$550.00 | \$1,705.00 |
| 05/10/2017 | JP | Correspondence with clients about Dr. Ho's new venture | 0.30 | \$425.00 | \$127.50 |
| 05/10/2017 | JL | Work on amended complaint. | 2.00 | \$550.00 | \$1,100.00 |
| 05/11/2017 | JL | Work on class complaint. | 2.20 | \$550.00 | \$1,210.00 |
| 05/12/2017 | DM | Call from [REDACTED] re issues central to bankruptcy and ongoing practice efforts; review text message from Dr. Latterman re [REDACTED]; draft responsive text; | 0.40 | \$725.00 | \$290.00 |

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| 05/12/2017 | JL | Phone call with potential witness/client. Work on amended complaint. | 2.50 | \$550.00 | \$1,375.00 |
| 05/14/2017 | DM | Review correspondence/ email from Michigan counsel for MDs; draft correspondence/ email re same; draft correspondence/ email re same; confer Kirk Morgan (MI counsel); review multiple materials; draft correspondence/ email to Morgan; confer CP; assess materials. | 3.50 | \$725.00 | \$2,537.50 |
| 05/15/2017 | DM | Draft correspondence/ email; draft correspondence/ email to AC counsel re status of settlement negotiations; confer [REDACTED]; confer and draft correspondence/ email to Morgan; review multiple correspondence/ email; review multiple correspondence/ email re Balboa issues; confer CP; call from [REDACTED] re MHT Bankruptcy; draft correspondence/ email re same; confer and coordinate; draft correspondence/ email to CP; review responsive correspondence/ email re [REDACTED]; draft correspondence/ email to [REDACTED]; | 3.90 | \$725.00 | \$2,827.50 |
| 05/15/2017 | JL | Work on amended complaint. Legal research [REDACTED]. | 3.00 | \$550.00 | \$1,650.00 |
| 05/15/2017 | RC | Work on settlement issues. | 1.00 | \$775.00 | \$775.00 |
| 05/16/2017 | JP | Conference with Dr. Buras and Mr. Massey regarding underlying facts; Conference with Mr. Patel regarding [REDACTED] | 0.60 | \$425.00 | \$255.00 |
| 05/16/2017 | DM | Review correspondence/ email from Dr. Bhagia; assess Univest status; assess AC status, and review correspondence/ email from AC counsel; review materials; confer [REDACTED]; draft memorandum; multiple correspondence/ email exchanges from Balboa doctors; confer CP; assess Balboa issues; assess and research re MHT bankruptcy; confer CP; review memoranda; draft correspondence/ email to [REDACTED]; review [REDACTED]; review correspondence/ email from Dr. Buras re [REDACTED]; | 3.60 | \$725.00 | \$2,610.00 |
| 05/16/2017 | JL | Work on global complaint. Review notice of bankruptcy and conference calls with attorneys re same. Legal research [REDACTED] | 3.60 | \$550.00 | \$1,980.00 |
| 05/17/2017 | JP | Numerous conferences and correspondences to Mr. Massey and Mr. Lemann regarding amended complaint; correspondence with clients regarding strategies and updates; and with potential clients regarding representation. | 2.30 | \$425.00 | \$977.50 |
| 05/17/2017 | DM | Review correspondence/ email from Dr. M. Walker; confer; draft memorandum; review correspondence/ email from [REDACTED]; draft responsive correspondence/ email; draft memorandum; assess materials needed by AC; confer re Balboa; review Patel communications; draft correspondence/ email to CP; draft correspondence/ email for Balboa CEO; [REDACTED]; review correspondence/ email from Dr. Latterman; review | 4.30 | \$725.00 | \$3,117.50 |

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| | | correspondence/ email from TX team; review correspondence/ email from [REDACTED]; review correspondence/ email from Dr. Imran; confer; review correspondence/ email re conference with former MHT employee; draft memorandum. | | | |
| 05/17/2017 | JL | Work on amended complaint. | 2.00 | \$550.00 | \$1,100.00 |
| 05/17/2017 | RC | Work on settlement issues. | 1.00 | \$775.00 | \$775.00 |
| 05/18/2017 | JP | Correspondence with numerous clients regarding strategy and facts and potential clients regarding representation | 0.90 | \$425.00 | \$382.50 |
| 05/18/2017 | JP | Conference call with Mr. Massey and potential clients; Correspondence to clients regarding strategy and potential clients regarding representation. | 1.50 | \$425.00 | \$637.50 |
| 05/18/2017 | DM | Review correspondence/ email from Dr. Latterman; draft responsive correspondence/ email; review correspondence/ email from Dr. Bhagia; draft responsive correspondence/ email; review correspondence/ email from Kirk Morgan; draft correspondence/ email to CP; draft correspondence/ email to Morgan and De Leon; review materials and discussion re possible MDL; assess Balboa issues. | 3.50 | \$725.00 | \$2,537.50 |
| 05/18/2017 | JL | Work on global amended complaint. Review communications with clients. | 2.70 | \$550.00 | \$1,485.00 |
| 05/19/2017 | DM | Review correspondence/ email from Dr. Patel; draft responsive correspondence/ email re [REDACTED]; confer CP; review materials for indications of CMS payouts and financial records of individual LLCs; review draft Master Complaint; conference with CP; review correspondence/ email from Dr. Bhagia; draft memorandum; confer Dr. Bhagia. | 3.80 | \$725.00 | \$2,755.00 |
| 05/19/2017 | JL | Conference call with attorneys to coordinate multiple litigations. Work on amended complaint. Research [REDACTED] | 4.80 | \$550.00 | \$2,640.00 |
| 05/19/2017 | RC | Confer re litigation strategy | 0.60 | \$775.00 | \$465.00 |
| 05/20/2017 | DM | Review correspondence/ email from Stallings re motion to transfer and dismiss; review pleadings; draft memorandum; continued revisions to master complaint; review Order by Judge Lindsay re BR stay, limited to MHT; review research on [REDACTED] review pleadings; draft memorandum; review multiple correspondence/ email exchanges with Dr. Patel; draft memorandum; review correspondence/ email from Dr. Butt; review responsive correspondence/ email; coordinate conference calls with clients; | 5.00 | \$725.00 | \$3,625.00 |
| 05/22/2017 | DM | Multiple correspondence/ email from MI counsel; multiple correspondence/ email exchanges; review PA counsel pleadings re motion to transfer cases to NDTX; review MHT BR issues; correspondence/ email exchanges other counsel | 3.70 | \$725.00 | \$2,682.50 |

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| 05/22/2017 | JL | Work on stating claims. | 1.00 | \$550.00 | \$550.00 |
| 05/23/2017 | DM | Prepare for and confer AC counsel re settlement issues; confer and coordinate with CP; confer and coordinate AC settlement issues; correspondence/ email re TX counsel; assess; | 3.10 | \$725.00 | \$2,247.50 |
| 05/23/2017 | JL | Draft amended complaint. Participate in conference call with various attorneys adverse to MHT. | 4.90 | \$550.00 | \$2,695.00 |
| 05/23/2017 | RC | Prepare for and confer AC counsel re settlement issues. | 2.00 | \$775.00 | \$1,550.00 |
| 05/24/2017 | DM | Settlement analysis; correspondence/ email exchanges with Ascentium counsel; review correspondence/ email and assess; draft correspondence/ email to class team of counsel; review materials re plaintiffs' counsel group possible retention of counsel in bankruptcy; confer; review correspondence/ email from Latterman re [REDACTED]; draft responsive correspondence/ email. | 3.00 | \$725.00 | \$2,175.00 |
| 05/24/2017 | JL | Review correspondence related to settlement discussions. Work on amended complaint. | 2.30 | \$550.00 | \$1,265.00 |
| 05/25/2017 | JP | Document review of recently received MHT documents | 1.80 | \$425.00 | \$765.00 |
| 05/25/2017 | DM | Confer multiple MDs; assess issues; draft correspondence/ email to Stammel re proposal from AC; review responsive; correspondence/ email; review and draft correspondence/ email re Master Complaint; coordinate same; assess Balboa issues; confer [REDACTED]; draft memorandum; assess correspondence/ email from MI counsel re possible cooperation with lawyers affiliated with Postle; draft correspondence/ email re same; review multiple correspondence/ email to named class plaintiffs; review Master complaint allegations and responses; review correspondence/ email from Latterman [REDACTED]; draft responsive correspondence/ email; review correspondence/ email from [REDACTED]; analysis of possible issues; review correspondence/ email exchanges re Balboa. | 6.20 | \$725.00 | \$4,495.00 |
| 05/25/2017 | JL | Draft correspondence to each named plaintiff and review responses. Review [REDACTED]. Work on draft of [REDACTED] | 2.40 | \$550.00 | \$1,320.00 |
| 05/26/2017 | JP | Conference with Mr. Massey and Mr. Lemann regarding amended complaint | 0.50 | \$425.00 | \$212.50 |
| 05/26/2017 | DM | Review correspondence/ email from Stammel; return call and draft correspondence/ email; review AC proposal; review correspondence/ email from Morgan (MI counsel); review materials re affiliation with Postle and Ferguson firm; draft correspondence/ email to Morgan re prior communications; confer CP re Master Complaint; confer Stammel; confer CP; draft correspondence/ email to class team; confer Morgan; draft memorandum; analysis of injunctive class certifiability; analysis of structural issues re settlement. | 4.80 | \$725.00 | \$3,480.00 |

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| 05/26/2017 | JL | Work on Amended complaint. Conference with Massey. Review client materials. | 5.00 | \$550.00 | \$2,750.00 |
| 05/26/2017 | RC | Work on amended complaint. | 1.30 | \$775.00 | \$1,007.50 |
| 05/27/2017 | JP | Correspondence with Mr. Massey regarding strategy | 0.20 | \$425.00 | \$85.00 |
| 05/29/2017 | JP | Review Amended Complaint | 2.80 | \$425.00 | \$1,190.00 |
| 05/29/2017 | DM | Review communication from [REDACTED]; review multiple correspondence/ email exchanges re Master Complaint; review Master Complaint draft; assess; assess AC status of possible joint motion | 2.70 | \$725.00 | \$1,957.50 |
| 05/30/2017 | DM | Motion for extension of Master Complaint filing deadline; meet and confer CP re status and strategy; coordinate approach to AC; analysis of Balboa issues; multiple correspondence/ email exchanges re pleadings; review correspondence/ email re Balboa; draft correspondence/ email to direct clients re extension and status; confer CP; coordinate discussions with AC; review correspondence/ email with attorney McCollom; draft responsive correspondence/ email; review correspondence/ email exchanges with Court re proposed Order; assess MHT bankruptcy pleadings; assess same; review correspondence/ email from Dr. Ortega. | 4.10 | \$725.00 | \$2,972.50 |
| 05/30/2017 | JP | Review Motion for Extension of Time; Conference with Mr. Massey regarding conference with Sagel; Conference with Mr. Massey regarding strategy; Conference with Mr. Sagel regarding [REDACTED]; Draft engagement letters for new clients; Correspondence with Dr. Ortega regarding individual lawsuit | 1.70 | \$425.00 | \$722.50 |
| 05/30/2017 | JL | Work on extension of time to amend complaint. Work on settlement negotiations. Work on amended complaint. | 1.00 | \$550.00 | \$550.00 |
| 05/31/2017 | DM | Confer Josh Bennett; correspondence/ email re same; confer CP re strategy and approach; review correspondence/ email from Bradley Leire; confer and coordinate; confer Steven Stallings; confer Dr. Latterman; confer [REDACTED]; assess issues central to Tx docs; review correspondence/ email from Dr. Patel re [REDACTED], and draft responsive correspondence/ email; review correspondence/ email from Dr. Kumar. | 2.90 | \$725.00 | \$2,102.50 |
| 05/31/2017 | JL | Confer with attorney for potential witness/client. Work on amended complaint. Work on fact investigation. | 2.20 | \$550.00 | \$1,210.00 |
| 06/01/2017 | JP | Research and fact investigation for master complaint, including draft memo to Mr. Lemann and conferences regarding same; review order on extension and related correspondence | 1.40 | \$425.00 | \$595.00 |
| 06/01/2017 | DM | Confer CP and TX team re Master Complaint, research coordination, status of negotiations; review correspondence/ email from Court, and review Order extending delay to file Master Complaint; draft memorandum; draft correspondence/ | 2.70 | \$725.00 | \$1,957.50 |

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| | | email to Stammel; confer attorney Stallings re multiple issues; review correspondence/ email exchange re Dr. Whitehouse; review correspondence/ email re Dr. Patel. | | | |
| 06/01/2017 | JL | Review materials from former employees of MHT. Review correspondence with client. Review materials related to Ascentium involvement. Work on amended complaint. | 5.10 | \$550.00 | \$2,805.00 |
| 06/02/2017 | DM | Confer Stammel; review correspondence/ email from Latterman; draft memorandum; correspondence/ email exchange with [REDACTED] re Master Complaint; correspondence/ email exchange with Stephen Stallings; review correspondence/ email from James McCollum; draft responsive correspondence/ email; | 3.00 | \$725.00 | \$2,175.00 |
| 06/02/2017 | JL | Work on amended complaint. Confer with potential client/ witnesses. Work on meeting with Ascentium. | 2.50 | \$550.00 | \$1,375.00 |
| 06/03/2017 | DM | Review text from Dr. Latterman; responsive communications | 0.20 | \$725.00 | \$145.00 |
| 06/04/2017 | JP | Review and respond to numerous correspondences from Mr. Massey, Mr. McCollom, and clients regarding potential clients and representation | 0.40 | \$425.00 | \$170.00 |
| 06/05/2017 | JP | Conferences with clients, potential clients, and attorneys regarding individual lawsuits and strategy | 0.90 | \$425.00 | \$382.50 |
| 06/05/2017 | DM | Confer J. Bennett re injunctive class issues; confer CP; assess [REDACTED]; research [REDACTED]; assess settlement strategy. | 3.90 | \$725.00 | \$2,827.50 |
| 06/05/2017 | JL | Work with local counsel. Work on b2 research. | 2.50 | \$550.00 | \$1,375.00 |
| 06/06/2017 | JP | Correspondence to clients and local attorneys for potential clients regarding individual lawsuits | 0.50 | \$425.00 | \$212.50 |
| 06/06/2017 | DM | Research [REDACTED] assess and confer; conference with J. Bennett and Leon Carter; confer with J Lemman; assess best and most favorable approach to settlement; review correspondence/ email from attorney Morgan; draft responsive correspondence/ email; review response; confer Paul Crouch; coordinate meeting with Stammel; review correspondence/ email exchanges re phone conference with multiple other counsel; review multiple reported case opinions. | 6.60 | \$725.00 | \$4,785.00 |
| 06/06/2017 | JL | Work on settlement negotiations. Conference call with plaintiff team. Work on Executive Summary and [REDACTED]. | 4.40 | \$550.00 | \$2,420.00 |
| 06/07/2017 | JP | Conference with Mr. Lemann and Mr. Massey regarding conference with Mr. Stammel; Conference with Mr. Stammel regarding potential settlement; Legal research [REDACTED] | 2.20 | \$425.00 | \$935.00 |
| 06/07/2017 | JL | Review [REDACTED]. Work on potential settlement. Meeting with counsel for defendant. | 4.80 | \$550.00 | \$2,640.00 |

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| 06/07/2017 | DM | Prepare for and attend meeting with Stammel, AC counsel; confer re settlement and resolution related issues on AC loans; review ██████████ re same. | 7.50 | \$725.00 | \$5,437.50 |
| 06/07/2017 | RC | Prepare for AC meeting. | 1.00 | \$775.00 | \$775.00 |
| 06/08/2017 | DM | Research law re ██████████; assess declaratory and injunctive relief; confer | 6.50 | \$725.00 | \$4,712.50 |
| 06/08/2017 | JL | Draft executive summary in furtherance of settlement negotiations. | 4.60 | \$550.00 | \$2,530.00 |
| 06/09/2017 | JL | Review ██████████ documents. Work on Executive Summary 408 memorandum. Legal research ██████████. Work on amended complaint. | 2.80 | \$550.00 | \$1,540.00 |
| 06/09/2017 | DM | Continue to research law re ██████████; continued review of case law and assess relief sought. | 5.20 | \$725.00 | \$3,770.00 |
| 06/10/2017 | DM | Continue research on ██████████; review bankruptcy notice and correspondence/ email from Dr. Melby; draft comprehensive memorandum for AC counsel; draft correspondence/ email to team. | 7.40 | \$725.00 | \$5,365.00 |
| 06/11/2017 | DM | Finalize discrete research on ██████████; revisions to memorandum for Stammel per FRE Rule 408; assess funding timing and issues for possible b3 fund; assess possible motion to approve and related pleadings template; confer; multiple correspondence/ email with team; draft correspondence/ email to Stammel. | 6.80 | \$725.00 | \$4,930.00 |
| 06/12/2017 | JL | Work on ██████████ research. Work on amended complaint. Telephone call with ██████████ and report of same. | 4.60 | \$550.00 | \$2,530.00 |
| 06/12/2017 | JP | Correspondence with Mr. Lemann regarding Dr. Lubbos and related facts | 0.20 | \$425.00 | \$85.00 |
| 06/12/2017 | DM | Review correspondence/ email from AC counsel re spreadsheet; draft memorandum to team; analysis of spreadsheet; ██████████ analysis; confer re non-testifying consultant re analytics for proposed settlement; draft memorandum; review correspondence/ email re fact witness on AC issues; assess and review most recent draft of Master Complaint. | 4.20 | \$725.00 | \$3,045.00 |
| 06/13/2017 | JP | Conference and correspondence with Dr. Imran regarding representation | 0.30 | \$425.00 | \$127.50 |
| 06/13/2017 | DM | Confer Stammel; confer CP team; draft correspondence/ email re non-testifying consultant; assess AC buckets for AC proposal; assess variable and impact on benefits to class; confer consultant; draft correspondence/ email to consultant; correspondence/ email exchanges re same; assess and formulate data runs for consultant; review correspondence/ email re former MHT contractor, ██████████; review memorandum; draft correspondence/ email re ██████████ | 5.20 | \$725.00 | \$3,770.00 |

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| | | [REDACTED]; review correspondence/ email from Dr. Latterman; draft responsive correspondence/ email. | | | |
| 06/13/2017 | JL | Interview potential witness. | 0.30 | \$550.00 | \$165.00 |
| 06/13/2017 | RC | Work on settlement matrix. | 1.00 | \$775.00 | \$775.00 |
| 06/14/2017 | JL | Work on amended complaint. Work on [REDACTED] research. Review correspondence and documents from clients. | 2.60 | \$550.00 | \$1,430.00 |
| 06/14/2017 | DM | Review and assess data; confer and retain consultant re AC data; confer and coordinate with consultant; draft correspondence/ email to consultant; assess methodology to test data, validate/ confirm and settlement methodology. | 4.70 | \$725.00 | \$3,407.50 |
| 06/15/2017 | DM | Review amended complaint; assess MHT BR issues; review materials re Balboa; assess; correspondence/ email exchange with Dr. Bhagia; review revised Master Complaint; draft correspondence/ email re same. | 3.10 | \$725.00 | \$2,247.50 |
| 06/15/2017 | JL | Work on amended complaint. Confer with potential witness. | 4.50 | \$550.00 | \$2,475.00 |
| 06/16/2017 | JL | Review [REDACTED] jurisprudence. Analyze License and Management Services Agreements. Review settlement accounting data. Work with witnesses. | 3.40 | \$550.00 | \$1,870.00 |
| 06/16/2017 | DM | Multiple correspondence/ email with consultant re AC data, and validating data. Confer CP; assess data; review correspondence/ email from Policarpio and Latterman re [REDACTED]; review pleadings; draft responsive correspondence/ email. | 4.60 | \$725.00 | \$3,335.00 |
| 06/16/2017 | RC | Prepare for AC meeting. | 1.00 | \$775.00 | \$775.00 |
| 06/17/2017 | DM | Review correspondence/ email re Balboa; confer consultant; assess data and validation efforts; confer counsel re Balboa issues; assess same; review correspondence/ email from Dr. Della Vecchio | 3.50 | \$725.00 | \$2,537.50 |
| 06/19/2017 | DM | Confer CP team re settlement issues; assess Master Complaint and delays; confer [REDACTED] re available materials (LLC Bank Records); assess data provided by AC counsel; confer accounting consultant; draft memorandum; confer and coordinate with AC counsel re conference call; prepare for and attend conference call; review correspondence/ email from Dr. Bhagia; review correspondence/ email from Dr. Latterman. | 5.40 | \$725.00 | \$3,915.00 |
| 06/20/2017 | JP | Correspondence with Dr. Patel and Mr. Carter regarding numerous issues | 0.40 | \$425.00 | \$170.00 |
| 06/20/2017 | DM | Confer TX counsel re deadline for filing Master Complaint; process for filing possible class settlement proposal and NDTX practices and preferences; confer re datasets and possible settlement approaches; confer CP team; draft correspondence/ email to AC counsel re settlement discussions; confer CP and TX team and draft correspondence/ email; analysis of BR hearing matter for | 6.20 | \$725.00 | \$4,495.00 |

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| | | MHT - 7/14; draft correspondence/ email re same; multiple correspondence/ email re AMHT creditors meeting; coordinate participation at hearing; draft correspondence/ email to [REDACTED]; review correspondence/ email from AC counsel; review additional data for spreadsheet to permit interest calculation; assess data; draft correspondence/ email to AC counsel; confer re status and strategy with CP and TX team; multiple correspondence/ email; confer accounting consultant re assessment and variable runs for settlement buckets. | | | |
| 06/20/2017 | JL | Work on revised complaint. Work on mediation issues. | 4.50 | \$550.00 | \$2,475.00 |
| 06/20/2017 | RC | Confer for litigation strategy. | 0.30 | \$775.00 | \$232.50 |
| 06/21/2017 | DM | Multiple correspondence/ email with accounting consultant; assess data and variables; correspondence/ email exchanges with MI counsel; assess BR issues; review correspondence/ email from TX counsel (Bennett) re MHT BR Creditor's hearing scope; draft memorandum; confer Kirk Morgan, MI Counsel; review most current, revised draft of Master Complaint; assess same. | 4.80 | \$725.00 | \$3,480.00 |
| 06/21/2017 | JL | Work on revising the global complaint. | 3.30 | \$550.00 | \$1,815.00 |
| 06/22/2017 | JP | Conference with Mr. Guillot and correspondence related to engagement letter | 0.30 | \$425.00 | \$127.50 |
| 06/22/2017 | DM | Multiple correspondence/ email re data parameters and analytics; confer re same; conferences with accounting consultant and team; assess buckets for proposed settlement classes, confer accounting consultant re interest and level of activity parameters and analytics; assess runs; review correspondence/ email from TX counsel re scope of BR hearing on 7/14; review separate correspondence/ email from Bennett re [REDACTED]; assess. | 4.20 | \$725.00 | \$3,045.00 |
| 06/23/2017 | DM | Confer accounting consultant; review memoranda; review data; assess possible settlement parameters; review correspondence/ email from MI counsel; assess same; draft correspondence/ email to MI counsel; confer CP team; draft correspondence/ email to MI counsel; confer MI counsel; correspondence/ email to team re settlement issues; status and strategy; draft correspondence/ email; review correspondence/ email from Stammel re mediation and mediators; confer Stammel re mediation and multiple issues; | 5.80 | \$725.00 | \$4,205.00 |
| 06/23/2017 | RC | Work on settlement. | 0.40 | \$775.00 | \$310.00 |
| 06/25/2017 | DM | Review correspondence/ email from accounting consultant; assess same and analytics re interest; assess impact of changes in interest rate on global values; review correspondence/ email from Stammel re extension; draft correspondence/ email to class team; review subsequent correspondence/ email from Stammel; draft memorandum; | 3.40 | \$725.00 | \$2,465.00 |

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| 06/26/2017 | DM | Confer accounting consultant; review email exchange; correspondence/ email exchanges with Class counsel team on extension and mediation issues; confer; correspondence/ email exchange with AC counsel/ Stammel re mediation and extension; review correspondence/ email from Dr. Latterman; draft responsive correspondence/ email; assess interest factor and interplay with other variables; coordinate addressing de minimis revenue issue re various settlement buckets and how to produce and modify analytics; review correspondence/ email from Dr. Bhagia; review withdrawal by LLC registered agent; draft memorandum; review correspondence/ email from AC counsel re filing of joint motion for extension; review correspondence/ email from court filing system re joint motion for extension; review accounting consultant work product re adjustments to interest rates; provide metrics for additional scenarios and confer. | 5.60 | \$725.00 | \$4,060.00 |
| 06/27/2017 | DM | Correspondence/ email with accounting consultant; assess same; review MHT materials re banking records; review correspondence/ email from [REDACTED] review correspondence/ email from Dr. Opaigbeogu;s; assess claims; assess status of joint motion to extend deadline; multiple correspondence/ email exchanges from Dr. Opaigbeogu; draft responsive correspondence/ email and multiple subsequent correspondence/ email; draft memorandum; investigate status of joint motion for extension; review correspondence/ email from Dr. Melby; draft responsive correspondence/ email; assess MHT documents re upcoming bankruptcy hearing. | 4.40 | \$725.00 | \$3,190.00 |
| 06/28/2017 | DM | Review correspondence/ email from Dickerson re NDA and engagement; review materials; assess matrix issues and review for fairness and proportionality; review correspondence/ email from Dr. Policarpio; draft memorandum; review correspondence/ email from Court EFS; review order re extension of master complaint filing delay; continued assessment of consultant's runs; review correspondence/ email from Dr. Obi; draft responsive correspondence/ email; assess AC data and various scenarios; review correspondence/ email from Josh Bennett; draft responsive correspondence/ email; review correspondence/ email from Dr. Policarpio; confer counsel; draft correspondence/ email; draft proposed communication to clients re status of cases. | 5.80 | \$725.00 | \$4,205.00 |
| 06/29/2017 | DM | Draft status update to clients; review scenarios from accounting consultant; correspondence/ email to clients; review responsive correspondence/ email; review correspondence/ email from Stammel re mediation on July 28, 2017; confer CP; draft responsive correspondence/ email; review and analysis of variables and various analytics using AC data; confer CP team; draft correspondence/ email; assess; coordinate mediation. | 4.50 | \$725.00 | \$3,262.50 |
| 06/29/2017 | JL | Work on mediation proposals. | 1.00 | \$550.00 | \$550.00 |

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| 07/02/2017 | DM | Correspondence/ email exchange with [REDACTED] re MHT [REDACTED]; draft memorandum; assess materials; review correspondence/ email from Stammel; review spreadsheets; draft correspondence/ email to class team; review Master Complaint drafts; assess status; draft correspondence/ email to Stammel; | 2.90 | \$725.00 | \$2,102.50 |
| 07/03/2017 | DM | Review and assess settlement issues and metrics; confer and assess; correspondence/ email from [REDACTED]; draft responsive correspondence/ email. | 1.60 | \$725.00 | \$1,160.00 |
| 07/04/2017 | DM | Review correspondence/ email re Univest pleadings; review pleadings; assess. | 0.40 | \$725.00 | \$290.00 |
| 07/05/2017 | JL | Confer with potential witnesses. Review documents. Work on amended complaint. | 2.50 | \$550.00 | \$1,375.00 |
| 07/05/2017 | DM | Review correspondence/ email from consultant Dickerson; review current runs; assess impact of quantum of payments at various subclasses; assess standard deviation analysis and method for fixing exclusionary levels for low activity; draft memorandum to CP team; conferences with Dickerson; continued evaluation and analysis; | 6.30 | \$725.00 | \$4,567.50 |
| 07/06/2017 | DM | Review correspondence/ email from Stammel re LLC bank statements and related matters; confer; draft responsive correspondence/ email; review correspondence/ email from consultant, Dickerson; review and analysis of recent runs; evaluate gradations and variables and impact; assess fairness, reasonableness and ease of application to class; draft comprehensive correspondence/ email to CP team; further review and analysis; confer consultant; draft memorandum; assess possible addition of pre-judgment interest; draft memorandum; review correspondence/ email from San Antonio Star reporter; draft correspondence/ email to class team; draft memorandum; review responsive correspondence/ email; review correspondence/ email from Crouch re MHT bankruptcy; confer Couhig re MHT creditor's meeting on 7/14; | 6.80 | \$725.00 | \$4,930.00 |
| 07/07/2017 | DM | Review draft materials; review additional runs; confer consultant - accounting; draft proposal to AC; draft correspondence/ email to CP team; draft revisions to proposal; confer. | 4.50 | \$725.00 | \$3,262.50 |
| 07/09/2017 | DM | Review materials and spreadsheets from Consultant; confer with CP and assess proposals/ runs. | 0.80 | \$725.00 | \$580.00 |
| 07/10/2017 | JP | Conferences with Mr. Lemann and Dr. Guillot regarding Dr. Guillot's engagement with our firm | 0.20 | \$425.00 | \$85.00 |
| 07/10/2017 | JL | Work on mediation preparation. Work on [REDACTED]. | 2.70 | \$550.00 | \$1,485.00 |
| 07/10/2017 | DM | Correspondence/ email to Stammel; assess mediator materials; confer CP; review correspondence/ email from MI counsel; call to and confer with MI counsel; assess and evaluate settlement options and proposal. | 3.60 | \$725.00 | \$2,610.00 |

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| 07/11/2017 | JP | Review emails regarding mediation and conference with Mr. Massey regarding mediation; Conference with Mr. Massey and Mr. Couhig regarding mediation. | 0.40 | \$425.00 | \$170.00 |
| 07/11/2017 | DM | Review correspondence/ email from Dr. Okoji; review responsive correspondence/ email; review correspondence/ email from mediator; draft responsive correspondence/ email exchanges; confer AC Counsel re mediation; assess demand and insurance company status; confer CP; assess insurance issues; draft correspondence/ email to AC Counsel; revisions to demand to include various claims versus insurer, who will participate in mediation; confer CP; correspondence/ email to AC re demand. | 5.50 | \$725.00 | \$3,987.50 |
| 07/12/2017 | JP | Correspondence with Goodwill Okoji regarding documents; Receive and review correspondence from Mr. Massey to Mr. Stammel regarding settlement negotiations; Receive and review documents from Dr. Okoji | 0.90 | \$425.00 | \$382.50 |
| 07/12/2017 | JL | Work on mediation preparation. Legal research [REDACTED]. Legal research [REDACTED]. | 3.60 | \$550.00 | \$1,980.00 |
| 07/12/2017 | DM | Ongoing review of master complaint drafts; confer CP re settlement negotiations and [REDACTED]; assess correspondence/ email from Tx counsel; research re [REDACTED]. | 5.80 | \$725.00 | \$4,205.00 |
| 07/13/2017 | JP | Correspondence with Dr. Guillot regarding representation; Correspondence with Mr. Massey regarding Louisiana doctors and review of files for information on Louisiana doctors | 0.30 | \$425.00 | \$127.50 |
| 07/13/2017 | JL | Review Van Mol/Guillot documentation. Prepare for Ascentium meeting. Review [REDACTED]. | 1.80 | \$550.00 | \$990.00 |
| 07/13/2017 | DM | Prepare for, travel to Plano and review multiple materials re AMHT bankruptcy creditors' meeting; question Scott Postle at hearing; multiple conferences en route, including with AMHT bankruptcy trustee counsel, Larry Levick. | 9.50 | \$725.00 | \$6,887.50 |
| 07/14/2017 | JL | Participate in meeting with Ascentium attorneys. Legal research [REDACTED] in preparation. Legal research [REDACTED]. Legal research in preparation of mediation. Review update on creditor's meeting. Review Central LA Senior Care MHT LLC documents. | 6.00 | \$550.00 | \$3,300.00 |
| 07/14/2017 | DM | Prepare for, and attend creditors creditors meeting; meet beforehand with trustee's lawyer, Larry Levick; confer AC counsel (Jordan Lew); meet Ryan Allen, counsel for about 25 doctors; meet various claimants and claimant reps; travel from Plano to AC counsel's office; meet and confer re resolution issues and law; confer; travel afterwards. | 10.90 | \$725.00 | \$7,902.50 |
| 07/14/2017 | RC | Attend creditor's meeting with Massey. Meeting with other MHT related counsel. | 10.00 | \$775.00 | \$7,750.00 |

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| 07/15/2017 | DM | Review financial records provided re 2015-2016 payouts by MHT to AC; confer CP re scope of payments; draft correspondence/ email to MHT BR trustee counsel (Levak) re scope of payments; review correspondence/ email from MI counsel; draft responsive correspondence/ email re BR issues; draft correspondence/ email to counsel re BR creditors' meeting and further strategy; draft memorandum to CP team; review correspondence/ email from MD re creditors' hearing; draft memorandum. draft correspondence/ email re status; draft correspondence/ email and memoranda re AC settlement discussions and mediation. | 5.40 | \$725.00 | \$3,915.00 |
| 07/15/2017 | JP | Receive and review chart related to Ascentium payoffs of doctor's loans and identification of doctors whose loans were paid off | 1.40 | \$425.00 | \$595.00 |
| 07/16/2017 | DM | Review [REDACTED] confer; | 1.70 | \$725.00 | \$1,232.50 |
| 07/16/2017 | JP | Correspondence with Mr. Massey and Mr. Lemann regarding potential clients and strategy for settlement | 0.40 | \$425.00 | \$170.00 |
| 07/17/2017 | DM | Coordinate mediation position paper; review responsive correspondence/ email from Morgan (MI counsel); assess McBride role - BR counsel for various doctors; review correspondence/ email re conference call with trustee; confer; review correspondence/ email re Guillot; review correspondence/ email re Jireck; review correspondence/ email with mediator; coordinate mediation issues. | 3.60 | \$725.00 | \$2,610.00 |
| 07/17/2017 | JP | Conference with Mr. Lemann regarding Draft Complaint and mediation; Review mediation request from mediator and gather responsive documents | 1.30 | \$425.00 | \$552.50 |
| 07/17/2017 | JL | Work on amended complaint. Work on settlement analysis. Work on certification issues. Assist in gathering information for discussions with counsel for putative class members. Review bankruptcy pleadings. | 3.10 | \$550.00 | \$1,705.00 |
| 07/18/2017 | DM | Prepare for and attend conference with MHT BR Trustee, MI counsel and McBride (BR counsel for various doctors); draft memorandum; confer; draft correspondence/ email to Court reporter; draft memorandum; assess BR issues; confer CP; draft correspondence/ email to BR trustee; draft memorandum; draft subsequent correspondence/ email to BR trustee. | 3.50 | \$725.00 | \$2,537.50 |
| 07/18/2017 | JP | Conference with Mr. Pyle about Dr. Jireck's experience with MHT; Review documents from [REDACTED] | 2.00 | \$425.00 | \$850.00 |
| 07/18/2017 | JL | Legal research [REDACTED]. Work on mediation preparation. Draft mediation statement. | 4.70 | \$550.00 | \$2,585.00 |
| 07/18/2017 | RC | Confer re conference with MHT BR Counsel with Massey. Prepare for mediation. | 3.50 | \$775.00 | \$2,712.50 |

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| 07/19/2017 | DM | Correspondence/ email to MI counsel; review correspondence/ email re Dr. Jiricick; review mediator communication and protocol; confer CP team re MHT bankruptcy; review correspondence/ email from attorney Morgan (MI counsel); draft revisions to mediation position statement; confer consultant/ draft correspondence/ email to consultant re calculation methodology; confer and coordinate; review correspondence/ email from Court reporter - MHT Bankruptcy Creditor's Hearing; confer and coordinate re PPT for AC mediation; confer and analysis of hard damage claims; review CP issues re inquiry about dissolution of LLC practice, and analysis of same. | 4.80 | \$725.00 | \$3,480.00 |
| 07/19/2017 | JL | Work on mediation preparation. | 2.50 | \$550.00 | \$1,375.00 |
| 07/20/2017 | JL | Confer with potential witnesses. Work on mediation statement and preparation. Work on global complaint. | 3.50 | \$550.00 | \$1,925.00 |
| 07/20/2017 | DM | Review correspondence/ email from Morgan; draft responsive correspondence/ email; confer Morgan; confer re MI doctor experience with McKenzie presence at sales pitch/ close meeting; review template declaration; draft correspondence/ email to attorney Morgan (MI); review correspondence/ email from consultant Dickerson; review materials from Dickerson and assess impact; review correspondence/ email re [REDACTED]; confer and coordinate; confer and coordinate Powerpoint for AC mediation | 4.00 | \$725.00 | \$2,900.00 |
| 07/20/2017 | RC | Work on mediation preparation. Phone calls with various clients re same. | 2.00 | \$775.00 | \$1,550.00 |
| 07/21/2017 | CG | Legal Research re [REDACTED] | 1.00 | \$390.00 | \$390.00 |
| 07/21/2017 | CG | Composition of memorandum to JPL re legal research on [REDACTED] | 0.30 | \$390.00 | \$117.00 |
| 07/21/2017 | DM | Confer Paul Crouch; determine status of cases in various state courts; review correspondence/ email exchanges re mediation related issues; finalize review of Master Complaint; analysis of [REDACTED]; draft memorandum/ correspondence/ email to CP team re Master Complaint; assess McKenzie representations. | 3.50 | \$725.00 | \$2,537.50 |
| 07/21/2017 | JP | Prepare documents and submissions for mediation | 1.60 | \$425.00 | \$680.00 |
| 07/21/2017 | JL | Work on [REDACTED] research. | 0.70 | \$550.00 | \$385.00 |
| 07/23/2017 | DM | Review correspondence/ email exchanges from TX counsel re hours accumulated and costs; review summary; draft correspondence/ email to AC counsel; assess status of Powerpoint; revision to position paper; review prior offers; draft memorandum and assess; review correspondence/ email from Dickerson; review revised spreadsheet; confer. | 3.90 | \$725.00 | \$2,827.50 |
| 07/23/2017 | JL | Work on draft of global complaint. | 1.70 | \$550.00 | \$935.00 |
| 07/24/2017 | CG | Follow-up legal research [REDACTED] | 0.30 | \$390.00 | \$117.00 |

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| 07/24/2017 | DM | Review correspondence/ email from Dickerson; assess; review and revise mediation position paper and attorney fact sheet; draft correspondence/ email to mediator; review lawyer hours and lodestar case; assess mediation issues; confer Lemann re Master Complaint; review correspondence/ email and draft Master Complaint; confer Pastorek re Powerpoint for mediation; draft correspondence/ email for mediator; confer and coordinate. | 6.50 | \$725.00 | \$4,712.50 |
| 07/24/2017 | JP | Prepare documents for mediation and related fact investigation; Prepare powerpoint for mediation; Correspondence with Dr. Obisesan regarding [REDACTED] and with other clients regarding amended complaint; Review Mediation Position paper | 3.00 | \$425.00 | \$1,275.00 |
| 07/24/2017 | JL | Work on global complaint. Work on bankruptcy analysis. Work on mediation preparation. Continue research [REDACTED] | 3.00 | \$550.00 | \$1,650.00 |
| 07/24/2017 | RC | Work on global complaint. Work on settlement negotiations. | 1.50 | \$775.00 | \$1,162.50 |
| 07/25/2017 | DM | Review correspondence/ email from attorney Allen; review mediation Powerpoint and revise; review Master Complaint; review multiple correspondence/ email and memoranda re client, mediation and related issues. | 3.70 | \$725.00 | \$2,682.50 |
| 07/26/2017 | DM | Draft correspondence/ email to Kirk Morgan, and review responsive correspondence/ email; draft correspondence/ email re same; review correspondence/ email from Ryan Allen; draft memorandum to team; confer re mediation issues; coordinate mediation issues; correspondence/ email exchanges with accounting consultant (Dickerson); review Powerpoint for mediation; revise; review correspondence/ email from Stammel re hours incurred; draft correspondence/ email to Stammel; call from Stammel; confer; identify documents for mediation; confer CP team; assess issues central to demographics; confer accounting consultant re methodology and final review and functioning of spreadsheets and approach to settlement discussions | 7.50 | \$725.00 | \$5,437.50 |
| 07/26/2017 | JP | Preparation for mediation; Edits to powerpoint for mediation; Review transcript of Creditors Meeting | 1.80 | \$425.00 | \$765.00 |
| 07/27/2017 | JP | Edits to Amended Complaint | 1.40 | \$425.00 | \$595.00 |
| 07/27/2017 | DM | Finalize preparation for mediation; assimilate materials; analysis of demographics; travel to Dallas, prepare for mediation. | 10.00 | \$725.00 | \$7,250.00 |
| 07/28/2017 | DM | Prepare for mediation; meet and confer Mr. Couhig; attend mediation; return travel; confer. | 16.00 | \$725.00 | \$11,600.00 |
| 07/28/2017 | JP | Additional fact investigation and edits to amended complaint | 2.50 | \$425.00 | \$1,062.50 |
| 07/28/2017 | RC | Prepare for and attend mediation with Massey and counsel for defendants. | 16.00 | \$775.00 | \$12,400.00 |
| 07/29/2017 | JP | Edits to amended complaint | 2.90 | \$425.00 | \$1,232.50 |

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|------------|----|--|------|----------|------------|
| 07/30/2017 | DM | Review revisions to Master Complaint; confer; assess same; draft memorandum; confer; assess status; multiple correspondence/ email re settlement issues with AC and related research and matters; confer accounting consultant (Dickerson) re methodology for settlement and template approach; confer and coordinate; confer Dickerson; draft memoranda; assess spreadsheet; review scenarios; assess; coordinate; confer; draft memorandum; draft correspondence/ email. | 5.20 | \$725.00 | \$3,770.00 |
| 07/30/2017 | JP | Edits to amended complaint | 1.70 | \$425.00 | \$722.50 |
| 07/31/2017 | JP | Conferences with Mr. Massey regarding amended complaint and mediation | 0.40 | \$425.00 | \$170.00 |
| 07/31/2017 | DM | Correspondence/ email exchanges with Bennett; confer re settlement issues (CP); assess status of Master Complaint; correspondence/ email exchanges with CP re strategy re settlement; confer and review correspondence/ email exchanges re [REDACTED] | 3.10 | \$725.00 | \$2,247.50 |
| 08/01/2017 | DM | Confer Stammel; confer CP; analysis of settlement issues; review correspondence/ email exchanges with AC counsel; review correspondence/ email with doctors re fraud issues; call from [REDACTED]; correspondence/ email from [REDACTED]; confer; draft correspondence/ email re transcript; analysis of status of Master Complaint; | 2.20 | \$725.00 | \$1,595.00 |
| 08/01/2017 | JL | Legal research re [REDACTED] | 2.80 | \$550.00 | \$1,540.00 |
| 08/02/2017 | DM | Confer AC counsel; confer CP and assess status and related issues; confer MRD; assess issues re LLCs and [REDACTED]; [REDACTED] subsequent correspondence/ email with Stammel; assess bucket issue. | 2.00 | \$725.00 | \$1,450.00 |
| 08/02/2017 | JL | Legal research [REDACTED] | 2.30 | \$550.00 | \$1,265.00 |
| 08/03/2017 | JP | Correspondence with Mr. Massey about settlement and notification to clients | 0.10 | \$425.00 | \$42.50 |
| 08/03/2017 | DM | Confer CP; draft memoranda; assess Master Complaint status. | 0.70 | \$725.00 | \$507.50 |
| 08/03/2017 | JL | Work on complaint. | 1.20 | \$550.00 | \$660.00 |
| 08/03/2017 | JL | Legal research [REDACTED] | 1.20 | \$550.00 | \$660.00 |
| 08/03/2017 | RC | Review and edit complaint | 0.80 | \$775.00 | \$620.00 |
| 08/04/2017 | DM | Coordinate Michigan travel; draft memorandum; assess issues central to settlement discussions; draft correspondence/ email to TX counsel; coordinate Master Complaint filing; confer CP lawyers | 1.60 | \$725.00 | \$1,160.00 |
| 08/04/2017 | JP | Conferences with Mr. Couhig regarding draft Complaint; Receive and review edits to complaint from Mr. Couhig and make and integrate further edits to Amended Complaint | 2.30 | \$425.00 | \$977.50 |

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|------------|----|---|-------|----------|------------|
| 08/04/2017 | CG | Research [REDACTED]; research [REDACTED] | 1.20 | \$390.00 | \$468.00 |
| 08/04/2017 | JL | Confer with clients. Work on revisions to complaint. | 4.10 | \$550.00 | \$2,255.00 |
| 08/04/2017 | RC | Conferences with Pastorek regarding draft Complaint | 0.20 | \$775.00 | \$155.00 |
| 08/05/2017 | DM | Review correspondence/ email from AC counsel re settlement counsel; review term sheet; multiple correspondence/ email with CP and TX counsel team; draft memorandum; confer accounting consultant (Dickerson); draft correspondence/ email to Dickerson; assess valuation issues; assess exclusions; confer and coordinate; coordinate conference calls and coordinate MC issues. | 5.30 | \$725.00 | \$3,842.50 |
| 08/05/2017 | JL | Work on term sheet analysis. | 1.60 | \$550.00 | \$880.00 |
| 08/06/2017 | DM | Correspondence/ email to Stammel re conference; correspondence/ email to TX counsel re conference; correspondence/ email exchanges with CP re term sheet; correspondence/ email to MI Counsel (Morgan) re meeting on 8/7; correspondence/ email to Ryan Allen re meeting; draft correspondence/ email to Latterman; draft correspondence/ email to CP team re logistics and strategy; draft correspondence/ email to CP team re discussion points; assess term sheet and identify discussion points; coordinate conference call with AC counsel; multiple correspondence/ email exchanges; participate in conference call with AC counsel; review AC materials; prepare for, coordinate and attend conference call with named clients; call with Dr. Latterman; confer CP; confer TX counsel. | 10.00 | \$725.00 | \$7,250.00 |
| 08/06/2017 | JL | Participate in conference call and work on term sheet analysis. | 2.00 | \$550.00 | \$1,100.00 |
| 08/06/2017 | RC | Participate in negotiations over term sheet. | 1.50 | \$775.00 | \$1,162.50 |
| 08/07/2017 | DM | Review correspondence/ email from Dr. Bhagia; review correspondence/ email from Dr. Latterman; confer CP; multiple correspondence/ email/ memorandum among CP team; assess Master Complaint deadlines and related issues; travel to Michigan; prepare for and meet with Kirk Morgan (MI Counsel); subsequent meeting with Morgan; travel; multiple conferences and multiple correspondence/ email. | 12.60 | \$725.00 | \$9,135.00 |
| 08/07/2017 | JP | Multiple correspondences regarding conferences with clients and potential settlement; Review edits to Master Complaint from Mr. Bennett and finalize draft; Review correspondence from Mr. Stammel and conference with Mr. Massey regarding settlement terms | 3.20 | \$425.00 | \$1,360.00 |
| 08/07/2017 | CG | Review bankruptcy pleadings | 1.00 | \$390.00 | \$390.00 |
| 08/07/2017 | JL | Work on communications with counsel and motion to extend deadline. Work on term sheet discussions. | 3.00 | \$550.00 | \$1,650.00 |
| 08/08/2017 | CG | Review recent filings and prepare brief memo | 0.60 | \$390.00 | \$234.00 |

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| 08/08/2017 | DM | Review multiple correspondence/ email exchanges among CP; confer CP re resolution issues and visits with plaintiffs' lawyers; coordinate multiple visits with plaintiffs' lawyers; assess same; draft memorandum | 5.50 | \$725.00 | \$3,987.50 |
| 08/08/2017 | JL | Work on settlement. | 0.50 | \$550.00 | \$275.00 |
| 08/09/2017 | JL | Calls with Massey. Call with putative member. | 1.20 | \$550.00 | \$660.00 |
| 08/09/2017 | JP | Draft explanatory document for potential class members | 4.80 | \$425.00 | \$2,040.00 |
| 08/09/2017 | DM | Correspondence/ email from Dickerson; draft correspondence/ email to CP re financial issues; schedule and coordinate multiple counsel meetings; multiple correspondence/ email re deal points; assess issues; prepare for and travel to Houston re meeting with Alyan Haidery; review correspondence/ email re bankruptcy pleadings by [REDACTED]; draft memorandum; confer CP; call with Steve Latterman; call with attorney Ike Tawill; travel to Houston to meet with attorney Haidery. | 11.00 | \$725.00 | \$7,975.00 |
| 08/10/2017 | CG | Research [REDACTED]; communication to CP attorneys regarding same | 0.50 | \$390.00 | \$195.00 |
| 08/10/2017 | DM | Meet with attorney Haidery; travel re meetings with Leon Carter and attorney Ryan Allen; confer re meeting; confer CP re opt out issues and scope of releases; assess terms and confer; review correspondence/ email from Ike Tawil; | 8.00 | \$725.00 | \$5,800.00 |
| 08/10/2017 | JL | Work on settlement issues. | 1.30 | \$550.00 | \$715.00 |
| 08/11/2017 | JP | Receive and review correspondence from Mr. Massey, Mr. Lemann, and Mr. Couhig regarding settlement discussions with potential class members | 0.90 | \$425.00 | \$382.50 |
| 08/11/2017 | DM | Travel and prepare for meeting with atty Ryan Allen; draft correspondence/ email to Leon Carter; review ECF filing - enrolling Russ Yeager; meet with Leon Carter; meet with Ryan Allen; return travel. | 13.00 | \$725.00 | \$9,425.00 |
| 08/11/2017 | JL | Work on analysis for Bhagia. Work on settlement approval pleading. Legal research [REDACTED]. | 2.40 | \$550.00 | \$1,320.00 |
| 08/12/2017 | DM | Review multiple correspondence/ email from attorney Ryan Allen; review materials re same; draft memorandum; confer attorney Eric De Leon; confer CP; coordinate travel to San Antonio, TX to meet with Eric De Leon; review Allen documents; review Nhue Ho statement. | 4.70 | \$725.00 | \$3,407.50 |
| 08/13/2017 | DM | Prepare for meeting with attorney Eric De Leon; travel to San Antonio, TX; meet with attorney De Leon; review multiple materials; correspondence/ email exchanges with attorney De Leon; correspondence/ email to AC counsel. | 13.50 | \$725.00 | \$9,787.50 |
| 08/14/2017 | DM | Correspondence/ email from TX counsel; confer attorney Allen; draft memorandum; confer CP; calls to Morgan and Stallings; assess Balboa and Univest docs issues. | 5.60 | \$725.00 | \$4,060.00 |

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| 08/14/2017 | JL | Work on amended complaint. Work on research [REDACTED] | 2.10 | \$550.00 | \$1,155.00 |
| 08/15/2017 | JP | Receive and review correspondence from Mr. Massey and Mr. Lemann regarding settlement terms and legal research | 0.40 | \$425.00 | \$170.00 |
| 08/15/2017 | DM | Draft correspondence/ email to [REDACTED] re Ho statement; draft memorandum; review correspondence/ email exchange re attorney Matt Cole; draft memorandum; draft correspondence/ email to Stammel; draft correspondence/ email to Morgan (MI); draft correspondence/ email to Haidery (HOU); draft correspondence/ email to De Leon (SAT); draft correspondence/ email to Stahlings (PA); review multiple correspondence/ email exchanges; confer attorney De Leon; confer attorney Morgan; confer attorney Hampton; confer CP; analysis of joint/ several law in CA and PA; assess same; draft memorandum and review memorandum; draft memorandum; review materials re BR issues - MHT bankruptcy; | 5.90 | \$725.00 | \$4,277.50 |
| 08/15/2017 | JL | Work on analysis of impact of settlement. Legal research [REDACTED] | 5.10 | \$550.00 | \$2,805.00 |
| 08/16/2017 | DM | Review correspondence/ email from Stammel re materials; confer CP; draft responsive correspondence/ email; prepare for and meet Balboa counsel re AC settlement issues; confer Haidery; confer CP; coordinate conference call with clients; confer multiple MDs, and review multiple correspondence/ email re MDs; review AC counsel correspondence/ email and review proposed Stipulation of Settlement; review AC spreadsheets; assess stipulation of settlement; draft correspondence/ email to TX counsel; assess issues; review AC spreadsheet; draft correspondence/ email re clarifications; draft memorandum; assess and compile data for other plaintiffs' lawyers; assess data. | 10.50 | \$725.00 | \$7,612.50 |
| 08/16/2017 | JP | Receive and review ADR summary filing; Receive and review correspondence from Mr. Stammel and Mr. Massey regarding settlement terms and correspondence with direct clients regarding conference regarding settlement | 0.80 | \$425.00 | \$340.00 |
| 08/16/2017 | JL | Work on settlement stipulation. Work on analysis of impact of settlement. Legal research [REDACTED] | 2.80 | \$550.00 | \$1,540.00 |
| 08/17/2017 | JP | Correspondence with Mr. Massey regarding potential class members and settlement terms; Conference with Mr. Sagel regarding [REDACTED] | 0.50 | \$425.00 | \$212.50 |
| 08/17/2017 | JL | Work on settlement proposal and analysis of impact of settlement. | 3.90 | \$550.00 | \$2,145.00 |
| 08/17/2017 | DM | Continue to review AC data; compilations; review Stipulation of Settlement; draft multiple comments; review correspondence/ email from Ryan Allen; review CP client listing and compile data; multiple conferences with CP and TX counsel; assess and confer re scope and details of AC | 6.40 | \$725.00 | \$4,640.00 |

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| | | proposed Stipulation of Settlement; confer CP re drop dead issues; draft memorandum; review [REDACTED]; | | | |
| 08/18/2017 | JL | Work on settlement proposal revisions. Legal research [REDACTED]. Work on draft of motion for settlement approval. Continue analysis of settlement impact. | 5.50 | \$550.00 | \$3,025.00 |
| 08/18/2017 | DM | Review and draft correspondence/ email re Stipulation of Settlement; confer REC; confer JP; assess settlement issues; review correspondence/ email from Morgan re clients in MI: draft spreadsheet with Morgan client data; call to Stammel; review correspondence/ email from [REDACTED]; draft responsive correspondence/ email; revisions to redline of Stip of Settlement; draft correspondence/ email to Stammel; | 7.50 | \$725.00 | \$5,437.50 |
| 08/20/2017 | JL | Participate in conference call with clients to [REDACTED]. Review Ascentium spreadsheets proposed in connection with settlement. | 2.50 | \$550.00 | \$1,375.00 |
| 08/20/2017 | JL | Conference call with 12 clients. Report of same. | 2.00 | \$550.00 | \$1,100.00 |
| 08/20/2017 | DM | Review correspondence/ email re conference call with clients; confer CP; prepare for and attend conference call with multiple doctors re status and settlement issues; confer CP. | 3.20 | \$725.00 | \$2,320.00 |
| 08/21/2017 | JP | Conferences with Mr. Massey and create spreadsheets for clients regarding Ascentium data; Conference with Dr. Buras regarding [REDACTED] Conference with Dr. Guillot regarding [REDACTED] | 4.00 | \$425.00 | \$1,700.00 |
| 08/21/2017 | CG | Conference with JTP re creation of spreadsheets for clients | 1.50 | \$390.00 | \$585.00 |
| 08/21/2017 | JL | Work on settlement. Work on conference call notes. Work on individual analyses. | 3.40 | \$550.00 | \$1,870.00 |
| 08/21/2017 | DM | Exchanges; draft memorandum; draft correspondence/ email to Tawil; review Tawil correspondence/ email re clients; draft correspondence/ email; review correspondence/ email from Morgan; assess data and draft correspondence/ email re status; coordinate spreadsheet and transmit; same for attorneys Allen, Tawil and De Leon; confer attorney Stammel re settlement status; confer Dr. Policarpio; confer Dr. Buras; conferences with Lemann and Couhig; review correspondence/ email re doctor feedback on settlement; confer attorney Stallings (PA) re Univest issues | 7.10 | \$725.00 | \$5,147.50 |
| 08/22/2017 | JP | Receive and review correspondence from clients regarding [REDACTED] Draft letter to clients regarding [REDACTED] | 1.80 | \$425.00 | \$765.00 |
| 08/22/2017 | JL | Work on settlement discussions. Confer with Kirk Morgan. | 2.20 | \$550.00 | \$1,210.00 |
| 08/22/2017 | DM | Review correspondence/ email from Stammel; confer CP; confer Stammel; review responses; review client communications; review communications from other lawyers. | 2.30 | \$725.00 | \$1,667.50 |

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| 08/23/2017 | JL | Draft settlement negotiation correspondence to opposing counsel and confer with Massey re same. | 1.30 | \$550.00 | \$715.00 |
| 08/23/2017 | DM | Multiple conferences re response to AC; confer CP; assess; multiple correspondence/ email exchanges; assess; confer. | 2.70 | \$725.00 | \$1,957.50 |
| 08/24/2017 | JP | Conferences with Mr. Massey and Mr. Lemann regarding settlement details and correspondence to clients regarding settlement negotiations | 0.20 | \$425.00 | \$85.00 |
| 08/24/2017 | JL | Participate in settlement discussion with defense counsel. Review correspondence. Work with counsel for potential class members. | 1.90 | \$550.00 | \$1,045.00 |
| 08/24/2017 | DM | Review correspondence/ email, confer Jonathan Lemann; assess impediments to settlement proposal by AC; review doctor correspondence/ email; review materials for doctors; confer REC; conference with AC counsel; draft correspondence/ email; assess; coordinate and confer with TX team counsel; confer and coordinate; review multiple correspondence/ email. | 5.50 | \$725.00 | \$3,987.50 |
| 08/25/2017 | JL | Work on settlement negotiation analysis. Work on correspondence. | 2.50 | \$550.00 | \$1,375.00 |
| 08/25/2017 | DM | Multiple correspondence/ email; assess status of proposed settlement; confer accounting consultant; assess data run re 1 IPA; review correspondence/ email; draft correspondence/ email to team re [REDACTED]; confer Lemann; confer REC; review multiple correspondence/ email. | 6.30 | \$725.00 | \$4,567.50 |
| 08/26/2017 | DM | Review correspondence/ email exchange re settlement issues; assess [REDACTED] metrics; | 1.90 | \$725.00 | \$1,377.50 |
| 08/27/2017 | JL | Conference call with plaintiff team. Draft proposed settlement offer. | 1.50 | \$550.00 | \$825.00 |
| 08/28/2017 | JL | Work on modified settlement proposals. Work on analysis for individual docs. Prepare for conference call with docs. | 2.30 | \$550.00 | \$1,265.00 |
| 08/28/2017 | DM | Multiple correspondence/ email and conferences re AC negotiations and settlement related issues; review redline of proposal; offer changes; assess; review draft confer accounting consultant; assess claims and issues; assess AC inquiry re reducing payment by Univest/ AC docs; confer. | 4.30 | \$725.00 | \$3,117.50 |
| 08/29/2017 | JP | Correspondence with Mr. Lemann regarding Master Complaint and Receive and review correspondence from Mr. Massey and Mr. Couhig regarding settlement negotiations | 0.30 | \$425.00 | \$127.50 |
| 08/29/2017 | JL | Work on settlement analysis and amended complaint. | 2.70 | \$550.00 | \$1,485.00 |
| 08/29/2017 | DM | Confer Dr. Obi; confer CP; assess AC communications; review accounting consultants figures; draft evaluative materials; confer CP; assess and draft materials re approach and evaluation. | 2.40 | \$725.00 | \$1,740.00 |

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| 08/30/2017 | JL | Telephone conference with Ryan Allen and discussion with internal team regarding settlement developments and amended complaint. | 1.30 | \$550.00 | \$715.00 |
| 08/30/2017 | JL | Telephone conference with Tim Van Mol. | 0.70 | \$550.00 | \$385.00 |
| 08/30/2017 | JL | Work on settlement analysis and work on amended complaint. | 1.20 | \$550.00 | \$660.00 |
| 08/30/2017 | JP | Review new draft of amended master complaint; Conference with Mr. Massey regarding settlement | 0.70 | \$425.00 | \$297.50 |
| 08/30/2017 | DM | Confer CP re evaluation and analysis of settlement strategies and scenarios for resolution of Univest and Balboa docs claims versus AC/ McKenzie; prepare for and call with attorney Ryan Allen; draft memorandum; confer REC; correspondence/ email to attorneys Tawil, De Leon, Haidery and Morgan; confer De Leon; review correspondence/ email from Tawil, and draft responsive correspondence/ email; confer and review materials re further revisions to Master Complaint. | 4.20 | \$725.00 | \$3,045.00 |
| 08/31/2017 | JL | Work on amended pleading. Work on motion to approve settlement. Work on settlement negotiations. | 3.10 | \$550.00 | \$1,705.00 |
| 08/31/2017 | DM | Multiple conferences with accountant and CP; assess status; address settlement issues; review recent draft settlement stipulation. | 1.80 | \$725.00 | \$1,305.00 |
| 09/01/2017 | DM | Confer Dickerson; confer CP; review metrics of proposed settlement; assess Univest and Balboa issues; analysis of procedure to remove AC/ Univest docs from settlement or address opt out threshold; confer and coordinate settlement issues; call to Leon; call to Josh Bennett; multiple correspondence/ email re settlement issues and master complaint; review most recent iteration of master complaint, and review alternative version in event of Ascentium resolution. | 3.80 | \$725.00 | \$2,755.00 |
| 09/01/2017 | JL | Work on drafting settlement language. Work on amended complaint. Confer with Patel. Work on client reporting. | 3.80 | \$550.00 | \$2,090.00 |
| 09/02/2017 | DM | Confer CP re settlement issues; review correspondence/ email exchanges; assess master complaint drafts; coordinate master complaint filing and addressing alternate versions of master complaint; confer CP. | 1.00 | \$725.00 | \$725.00 |
| 09/03/2017 | DM | Correspondence/ email exchanges; review stipulation of settlement draft; confer CP; draft correspondence/ email re revisions; confer CP re addressing bucket issues and master complaints. | 0.90 | \$725.00 | \$652.50 |
| 09/03/2017 | JL | Conference call with co-counsel and work on settlement drafting. | 1.20 | \$550.00 | \$660.00 |
| 09/04/2017 | JL | Work on motion to approve settlement. Work on draft of stipulated settlement. | 4.50 | \$550.00 | \$2,475.00 |

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| 09/04/2017 | DM | Multiple conferences and assessment of AC data; confer CP; review current drafts of Master Complaint. | 1.20 | \$725.00 | \$870.00 |
| 09/05/2017 | JP | Receive and review Memo in Support of Motion for Approval and edits to Master Complaint | 4.40 | \$425.00 | \$1,870.00 |
| 09/05/2017 | JL | Work on motion to approve settlement. Work on settlement negotiations. Work on amending complaint. | 4.20 | \$550.00 | \$2,310.00 |
| 09/05/2017 | DM | Review correspondence/ email from AC counsel, and review proposed stipulation draft; confer CP; draft revisions and draft memorandum; confer CP re class reps; assess class rep status; review draft motion for preliminary approval of class settlement; draft revisions and draft memorandum; assess newly proposed buckets; confer accounting consultant, Dickerson; review correspondence/ email from Dickerson; conferences with Dickerson; confer CP re buckets (time driven); confer re settlement status and possible request by AC to court for extension; evaluate best ways forward. | 5.50 | \$725.00 | \$3,987.50 |
| 09/06/2017 | JP | Receive and review correspondence and pleadings from Mr. Stammel and conferences with Mr. Massey and Mr. Couhig | 0.50 | \$425.00 | \$212.50 |
| 09/06/2017 | JL | Organize and participate in conference call with clients. Work on motion to approve settlement. Work on amended complaint. Review emails re agreement with Stammel. Review proposed motion. | 4.00 | \$550.00 | \$2,200.00 |
| 09/06/2017 | DM | Review correspondence/ email from MHT BR court; assess MHT trustee motion; confer CP; review alternate complaint for Univest and/ or Balboa does if claims remaining; review correspondence/ email from Dr. Bhagia; draft correspondence/ email; review correspondence/ email from Dr. Latterman; draft responsive correspondence/ email; confer CP; review correspondence/ email from Stammel; confer Josh Bennett; correspondence/ email to Josh Bennett; review correspondence/ email re proposed motion; assess status; review ecf filing; review filed pleading; confer CP and draft correspondence/ email re conference with named plaintiffs; confer re status and strategy; confer other counsel; multiple correspondence/ email exchanges; review Order re extension; draft correspondence/ email to clients; coordinate conference call with named plaintiffs; draft multiple correspondence/ email to lawyers representing multiple plaintiffs; confer and coordinate; review materials re settlement stip draft. | 8.60 | \$725.00 | \$6,235.00 |
| 09/07/2017 | JL | Work on negotiations. Work on conference call notes. Confer with Dr. Green. Work on amendment research. | 2.75 | \$550.00 | \$1,512.50 |
| 09/07/2017 | DM | Multiple correspondence/ email exchanges with MDs and other counsel re status; confer [REDACTED] review correspondence/ email from Policarpio; review correspondence/ email from Latterman re possible transfer issues re Univest EDPA matters; call to Stallings; correspondence/ email to Stallings; assess and coordinate; | 4.40 | \$725.00 | \$3,190.00 |

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| | | confer CP; assess MHT BR trustee order; confer Kirk Morgan; | | | |
| 09/08/2017 | JL | Review emails from class members and lawyers. Confer with Patel and Van Mol. | 0.90 | \$550.00 | \$495.00 |
| 09/08/2017 | DM | Review correspondence/ email exchange re MHT BR filings; assess and coordinate; address BR issues and consider scope of release language re AC settlement proposal; draft memoranda; | 1.00 | \$725.00 | \$725.00 |
| 09/10/2017 | JL | Work on amended complaint. | 3.20 | \$550.00 | \$1,760.00 |
| 09/10/2017 | JL | Conference call with clients re potential settlement. | 1.00 | \$550.00 | \$550.00 |
| 09/11/2017 | DM | Confer CP; review current drafts amended complaint/ master complaint; review current draft motion for preliminary settlement, certification of settlement class, etc.; review correspondence/ email from Stammel; confer Stammel; confer CP; multiple conferences and correspondence/ email to and from accountant, Dickerson; assess, analyze and arrive at proposal to address [REDACTED]; confer; correspondence/ email to Stammel; confer re Univest; confer re outstanding stipulation issues. | 4.80 | \$725.00 | \$3,480.00 |
| 09/11/2017 | JL | Work on settlement. | 4.00 | \$550.00 | \$2,200.00 |
| 09/12/2017 | JP | Draft Nondisclosure Agreement for Mr. Morgan | 0.30 | \$425.00 | \$127.50 |
| 09/12/2017 | DM | Review correspondence/ email from AC counsel; review materials; confer AC counsel re settlement proposal; confer MI counsel, Kirk Morgan; revision draft NDA; confer; review materials re same; correspondence/ email with Ryan Allen; confer Leon Carter; review and assess bucketed divisions; review subsequent correspondence/ email from Stammel; draft responsive correspondence/ email; participate in conference call; review correspondence/ email with Stip. of Settlement; Melby call, confer Dr. Melby; review correspondence/ email from Dr. Obi; call from MHT BR trustee, Levik; assess MHT issues; assess indemnity issues. | 5.20 | \$725.00 | \$3,770.00 |
| 09/12/2017 | JL | Several calls with opposing counsel and consulting CPA. Work on settlement negotiations. | 7.50 | \$550.00 | \$4,125.00 |
| 09/13/2017 | DM | Review correspondence/ email from Stammel; review Stip of Settlement; correspondence/ email to Stammel; review materials re class settlement; confer accountant consultant, Dickerson; confer Lemann; review correspondence/ email from Dickerson and analysis of AC proposal; draft multiple comments re AC proposed Stip. of Settlement; confer CP; assess scope of proposed settlement - inclusion of prior doctors in program, no longer owing any IPAs; confer Couhig; correspondence/ email to Leon Carter; assess comments from attorney Jordan Leu; review correspondence/ email exchange from Dr. Latterman; call from Dr. Latterman; confer; review correspondence/ email exchange from Dr. Bhagia. | 5.50 | \$725.00 | \$3,987.50 |

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| 09/13/2017 | JP | Edits to Motion to Approve Settlement | 1.10 | \$425.00 | \$467.50 |
| 09/13/2017 | JL | Work on settlement negotiations and motion to approve. Several calls with opposing counsel. | 7.10 | \$550.00 | \$3,905.00 |
| 09/14/2017 | TM | Legal research [REDACTED] | 0.80 | \$75.00 | \$60.00 |
| 09/14/2017 | DM | Multiple correspondence/ email/ texts with Dr. Latterman; multiple correspondence/ email/ texts with Dr. Patel; assess Univest issues; draft correspondence/ email to attorney Ryan Allen; draft memorandum; confer CP re settlement discussions with AC re Stip of Settlement; confer and coordinate Master Complaint issues; assess same; assess motion for preliminary approval/ conditional class cert; assess and confer; review revised versions of Stip of Settlement; review multiple correspondence/ email exchanges; travel to Dallas. | 8.00 | \$725.00 | \$5,800.00 |
| 09/14/2017 | JL | Work on settlement negotiations. Calls with opposing counsel. | 6.60 | \$550.00 | \$3,630.00 |
| 09/15/2017 | TM | Legal Research [REDACTED] | 0.50 | \$75.00 | \$37.50 |
| 09/15/2017 | JP | Conferences with Mr. Lemann regarding settlement issues | 0.60 | \$425.00 | \$255.00 |
| 09/15/2017 | JL | Confer with bankruptcy counsel. Confer with opposing counsel. Work on settlement negotiations. | 9.00 | \$550.00 | \$4,950.00 |
| 09/16/2017 | JP | Review settlement documents and edit draft filings | 1.10 | \$425.00 | \$467.50 |
| 09/16/2017 | DM | Review proposed indemnity, bar order and related Stip of Settlement language; confer CP; draft revisions; confer and draft memorandum; review correspondence/ email from counsel for doctor in MS; draft responsive correspondence/ email; confer and coordinate; confer CP; assess status of Stip of Settlement and related pleadings; review correspondence/ email exchanges re named plaintiffs; confer Melby; confer Policarpio; confer CP; draft memorandum; review correspondence/ email re conference call with clients; assess and coordinate. | 8.20 | \$725.00 | \$5,945.00 |
| 09/16/2017 | JL | Confer with clients. Work on stipulation of settlement and motion for preliminary approval. | 6.30 | \$550.00 | \$3,465.00 |
| 09/17/2017 | JP | Review settlement documents and conference call with Mr. Massey and clients | 2.90 | \$425.00 | \$1,232.50 |
| 09/17/2017 | DM | Multiple correspondence/ email with Dr. Patel; multiple correspondence/ email exchanges with other counsel (class counsel) re negotiations on merits, and review multiple versions and changes to Stip of Settlement; review multiple correspondence/ email exchanges re motion for preliminary certification and related pleadings; review multiple spreadsheets; multiple conferences with class counsel team; assess multiple proposals; prepare for and attend conference call with multiple doctors; review correspondence/ email exchanges from doctors inquiring about specifics of deal; assess; coordinate deal; correspondence/ email strategy; | 7.80 | \$725.00 | \$5,655.00 |

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| 09/17/2017 | JL | Confer with clients. Negotiate with opposing counsel. Work on stipulation of settlement and orders, and work on motion for preliminary approval. | 12.40 | \$550.00 | \$6,820.00 |
| 09/18/2017 | TM | Edits to Motion to approve settlement and added tables of contents and authorities | 1.60 | \$75.00 | \$120.00 |
| 09/18/2017 | TM | Created settlement information email including individual settlement amounts | 0.50 | \$75.00 | \$37.50 |
| 09/18/2017 | DM | Confer CP team re status of settlement on merits; review new variants on settlement proposal; multiple correspondence/ email re Stipulation of Settlement and related pleadings; analysis and attempt to understand formula for distribution of Balboa doctors funds; multiple correspondence/ email to private counsel for doctors; assess and confirm agreement on deal points on merits; commence communications on class counsel fee issues; assess same; multiple correspondence/ email exchanges; assess method and handling of stip of settlement, master complaint and related issues; coordinate filing of master complaint; multiple conferences with co-class counsel; correspondence/ email and confer private counsel for various doctors (Ryan Allen, Eric De Leon and Kirk Morgan); correspondence/ email exchanges with Steve Stallings; assess status and strategy; multiple conferences re appropriate filings re Master Complaint. | 9.50 | \$725.00 | \$6,887.50 |
| 09/18/2017 | JP | Correspondence and conferences regarding filings and settlement; edits to multiple motions, versions of amended complaints, and related documents | 8.40 | \$425.00 | \$3,570.00 |
| 09/18/2017 | JL | Confer with various class members and clients. Confer with opposing counsel. Work on finalizing settlement. Work on proposed orders, motion to approve and settlement agreement. | 12.60 | \$550.00 | \$6,930.00 |
| 09/19/2017 | DM | Multiple conferences with class counsel team; correspondence/ email exchanges re status; calls and correspondence/ email re settlement status; confer Morgan (MI); confer Dr. Okoji (Maryland); correspondence/ email exchange with attorney Stallings. | 2.40 | \$725.00 | \$1,740.00 |
| 09/19/2017 | JL | Review court order and evaluate impact. Work on finalizing settlement agreement. Discussion with class members and other attorneys. Work on accounting issues. | 5.70 | \$550.00 | \$3,135.00 |
| 09/20/2017 | DM | Confer CP; assess outstanding issues; prepare and confer with attorney Stallings (PA counsel) re settlement terms; multiple correspondence/ email exchanges from and with class members re settlement related issues; prepare for and confer Ryan Allen; communication from [REDACTED]; call to [REDACTED]; draft memorandum; multiple correspondence/ email and conferences with class counsel team re reaching final resolution of Stipulated issues; multiple conferences with AC counsel; draft correspondence/ email, and review correspondence/ email; negotiate; confer class counsel team. | 6.80 | \$725.00 | \$4,930.00 |

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| 09/20/2017 | JP | Conference with Mr. Stallings and Mr. Massey regarding settlement terms and correspondence with clients regarding settlement | 0.90 | \$425.00 | \$382.50 |
| 09/20/2017 | JL | Work on finalizing attorney fee agreement. Look into accounting issues. | 2.30 | \$550.00 | \$1,265.00 |
| 09/21/2017 | JL | Work on finalizing motion to approve. | 0.70 | \$550.00 | \$385.00 |
| 09/21/2017 | DM | Multiple conferences, review correspondence/ email exchanges re settlement issues; confer and draft memorandum; assess and coordinate; confer CP; draft memorandum; confer Stammel; negotiate; coordinate multiple settlement issues and pleadings; multiple correspondence/ email; review correspondence/ email re creditors' hearings; call from [REDACTED]; confer; multiple conferences with CP | 3.50 | \$725.00 | \$2,537.50 |
| 09/22/2017 | JL | Correspond with clients. Work on stipulation, motion to approve, and orders. | 1.40 | \$550.00 | \$770.00 |
| 09/22/2017 | DM | Assess settlement status; review current redlines of settlement materials; confer CP; draft correspondence/ email to Stammel re status; review correspondence/ email re complaint; assess; review correspondence/ email from Stammel; confer CP; coordinate filings; assess opt out issues. | 2.80 | \$725.00 | \$2,030.00 |
| 09/23/2017 | JL | Work on stipulation, proposed orders, and motion to approve. | 1.20 | \$550.00 | \$660.00 |
| 09/23/2017 | DM | Evaluate settlement status; review recent correspondence/ email from Stammel; draft correspondence/ email to Stammel; | 0.30 | \$725.00 | \$217.50 |
| 09/25/2017 | CG | Prepare service documents for Postle | 0.20 | \$390.00 | \$78.00 |
| 09/25/2017 | JL | Communicate with clients. Work on motion to approve. | 3.70 | \$550.00 | \$2,035.00 |
| 09/25/2017 | DM | Correspondence/ email exchanges with AC counsel; review confirmation of settlement agreement final terms; draft memorandum; confer Crouch; confer CP; correspondence/ email exchanges with class team. | 1.20 | \$725.00 | \$870.00 |
| 09/26/2017 | JL | Discussions with opposing and local counsel. Finalize and file stipulation and motion for approval of settlement. | 4.60 | \$550.00 | \$2,530.00 |
| 09/26/2017 | DM | Review correspondence/ email from AC counsel confirming Univest settlement; draft correspondence/ email to counsel; confer CP re filing motion for preliminary approval; confer and coordinate; review correspondence/ email from EFS re filings and conformed pleadings; draft correspondence/ email to all known counsel for multiple doctors; correspondence/ email exchanges with class counsel. | 6.40 | \$725.00 | \$4,640.00 |
| 09/27/2017 | JL | Confer with clients. Telephone with class member counsel. Evaluate accounting issues. | 4.20 | \$550.00 | \$2,310.00 |
| 09/27/2017 | DM | Correspondence/ email from [REDACTED]; review media re settlement; confer CP; review correspondence/ email from MDs; review and confer re tax issue posed by MI counsel; | 2.80 | \$725.00 | \$2,030.00 |

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| | | coordinate discussions with counsel; review correspondence/ email re proposed order; review correspondence/ email from court filing system re enrollment of counsel; assess settlement issues. | | | |
| 09/28/2017 | JP | Correspondence with Mr. Guillot and Mr. Lemann regarding settlement | 0.20 | \$425.00 | \$85.00 |
| 09/28/2017 | JL | Confer with clients. Confer with counsel for clients. Evaluate accounting issues. Work on post approval requirements. | 2.10 | \$550.00 | \$1,155.00 |
| 09/28/2017 | DM | Confer and review multiple correspondence/ email exchanges re settlement. | 0.20 | \$725.00 | \$145.00 |
| 09/29/2017 | JL | Calls and correspondence with clients regarding settlement. | 1.80 | \$550.00 | \$990.00 |
| 09/29/2017 | DM | Call from AC counsel; confer; confer CP. | 0.30 | \$725.00 | \$217.50 |
| 10/02/2017 | DM | Assess status of settlement motion; correspondence/ email re same; call from attorney Ryan Allen; confer; review correspondence/ email from consultant Dickerson; draft correspondence/ email re same. | 0.80 | \$725.00 | \$580.00 |
| 10/03/2017 | DM | Call from attorney Alyan Hadiery; confer; review recent public articles and information about Ascentium/MHT scheme, and litigation; review correspondence/ email from Dr. Bhagia; review correspondence/ email from BR court and review order re assets; call from attorney Crouch; confer; review pleadings | 2.00 | \$725.00 | \$1,450.00 |
| 10/04/2017 | JL | Phone calls with putative members. Review due process class action certification issues. | 1.70 | \$550.00 | \$935.00 |
| 10/04/2017 | DM | Confer Paul Crouch; confer re status; review filings; confer CP; assess tax issue raised by several docs. | 1.20 | \$725.00 | \$870.00 |
| 10/05/2017 | JL | Confer with potential class members re settlement terms. | 1.00 | \$550.00 | \$550.00 |
| 10/05/2017 | DM | Correspondence/ email with TX counsel re status of order and hearing (if any) on joint motion for preliminary approval; review responsive correspondence/ email; confer CP; coordinate strategy. | 0.80 | \$725.00 | \$580.00 |
| 10/06/2017 | DM | Review correspondence/ email from Dr. Latterman re status; draft responsive correspondence/ email; review correspondence/ email from Dr. Kumar; draft responsive correspondence/ email; review ECF filings - motion to enroll Univest counsel; review correspondence/ email from Dr. Ortega, and review response by Jeff Pastorek; | 1.60 | \$725.00 | \$1,160.00 |
| 10/11/2017 | DM | Confer CP; assess same; confer re settlement status; call from Paul Crouch; correspondence/ email; call with Latterman and Sandy; | 1.70 | \$725.00 | \$1,232.50 |
| 10/12/2017 | JL | Confer with Kirk Morgan. Work on motion in support of approval. Review defendants' response. | 1.00 | \$550.00 | \$550.00 |

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| 10/12/2017 | DM | Review correspondence/ email from AC counsel, and review AC memorandum in support of motion for preliminary; confer; review certification and settlement; draft correspondence/ email to AC counsel; draft correspondence/ email to co-counsel for class; review correspondence/ email from Morgan, and review creditor's hearing transcript; assess correspondence/ email. | 2.00 | \$725.00 | \$1,450.00 |
| 10/13/2017 | DM | Review correspondence/ email from Court's ECF system; review correspondence/ email from Latterman; assess; assess status of settlement; correspondence/ email to CP team. | 0.70 | \$725.00 | \$507.50 |
| 10/15/2017 | DM | Correspondence/ email exchanges re addressing objections to settlement; review correspondence/ email exchanges from Kirk Morgan and review materials re "novation" with AC and MHT; draft correspondence/ email to attorney Morgan; draft correspondence/ email to Patel. | 1.40 | \$725.00 | \$1,015.00 |
| 10/16/2017 | JP | Receive and review correspondence from Mr. Massey, Mr. Patel, and Mr. Morgan | 1.10 | \$425.00 | \$467.50 |
| 10/16/2017 | DM | Review correspondence/ email from attorney Morgan; review correspondence/ email exchange; review materials, and draft response; review correspondence/ email from Univest doctor re Univest dismissal of AC; review subsequent correspondence/ email; assess; draft responsive correspondence/ email; draft memorandum to CP team; review correspondence/ email from doctor rep re feedback on settlement; draft responsive correspondence/ email, and review correspondence/ email exchange; draft correspondence/ email to CP team; assess MHT BR status; draft memorandum; assess enrollment in MHT BR matter; review correspondence/ email exchanges - CP. | 3.20 | \$725.00 | \$2,320.00 |
| 10/16/2017 | JL | Discussions with Kirk Morgan. Work on analysis of Morgan's clients. | 1.40 | \$550.00 | \$770.00 |
| 10/17/2017 | DM | Review correspondence/ email from Leslie Latterman; review responsive correspondence/ email from attorney Stallings; review memorandum; review correspondence/ email re same; confer counsel re status. | 0.50 | \$725.00 | \$362.50 |
| 10/18/2017 | DM | Confer re status of matter; review correspondence/ email from MI counsel; review correspondence/ email from Dr. Bhagia; assess; review correspondence/ email re scheduling. | 0.30 | \$725.00 | \$217.50 |
| 10/19/2017 | DM | Review correspondence/ email from Dr. Bhagia re status; draft responsive correspondence/ email. | 0.20 | \$725.00 | \$145.00 |
| 10/20/2017 | DM | Review correspondence/ email from Kirk Morgan (MI) requesting conference call with his clients and us; confer; draft correspondence/ email to coordinate; draft correspondence/ email to Morgan; review responsive correspondence/ email; review correspondence/ email from Dr. Bhagia re status; draft response; draft memorandum; draft correspondence/ email; | 1.00 | \$725.00 | \$725.00 |

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| 10/23/2017 | DM | Review correspondence/ email from AC counsel; confer CP. | 0.20 | \$725.00 | \$145.00 |
| 10/25/2017 | DM | Draft correspondence/ email to AC counsel; confer Josh Bennett (Dallas counsel); confer AC counsel and coordinate. | 0.50 | \$725.00 | \$362.50 |
| 10/26/2017 | DM | Prepare for MI doctor call; review settlement filings; confer CP. | 0.50 | \$725.00 | \$362.50 |
| 10/27/2017 | DM | Review correspondence/ email from Morgan; confer CP; draft correspondence/ email to CP reps re MI doctor call; prepare for and attend MI doctor call; confer CP and call to attorney Kirk Morgan; review correspondence/ email from attorney Crouch re motion for approval; draft responsive correspondence/ email | 2.10 | \$725.00 | \$1,522.50 |
| 10/30/2017 | DM | Confer Kirk Morgan (MI counsel); confer CP re possible memorandum. | 0.40 | \$725.00 | \$290.00 |
| 11/01/2017 | DM | Review correspondence/ email from Dr. Patel; draft responsive correspondence/ email. | 0.20 | \$725.00 | \$145.00 |
| 11/02/2017 | JL | Work on analysis of settlement recommendation to submit to class. | 3.10 | \$550.00 | \$1,705.00 |
| 11/06/2017 | DM | Review correspondence/ email from AC counsel re status; draft responsive correspondence/ email; call message from attorney Verrico (Las Vegas, NV) re Balboa; draft correspondence/ email. | 0.60 | \$725.00 | \$435.00 |
| 11/07/2017 | JL | Prepare for call with counsel for doctor. | 0.20 | \$550.00 | \$110.00 |
| 11/07/2017 | DM | Review subsequent correspondence/ email from AC counsel re status; confer and draft responsive correspondence/ email | 0.20 | \$725.00 | \$145.00 |
| 11/08/2017 | JL | Work on analysis of settlement tax implications. | 0.60 | \$550.00 | \$330.00 |
| 11/10/2017 | JL | Review sample LLC documentation and discuss impact of good standing. | 1.50 | \$550.00 | \$825.00 |
| 11/10/2017 | DM | Review correspondence/ email from Dr. Obi; draft memorandum and analysis [REDACTED] draft team correspondence/ email re evaluation draft for class members. | 0.50 | \$725.00 | \$362.50 |
| 11/13/2017 | DM | Review correspondence/ email from Ryan Allen re status; evaluate and draft responsive correspondence/ email; review correspondence/ email from Dr. Buras and Pastorek correspondence/ email. | 0.30 | \$725.00 | \$217.50 |
| 11/14/2017 | JL | Review stipulation of settlement and work on assessment of the merits for the benefit of the class. | 1.20 | \$550.00 | \$660.00 |
| 11/15/2017 | DM | Review correspondence/ email from Dr. Bhagia re Univest status; review correspondence/ email from Dr. Latterman re Univest status; review correspondence/ email from Dr. Alexander and Pastorek [REDACTED] | 0.30 | \$725.00 | \$217.50 |

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| 11/17/2017 | DM | Review correspondence/ email exchange re contacting Judge Lynn's chambers; confer counsel. | 0.20 | \$725.00 | \$145.00 |
| 11/21/2017 | DM | Review correspondence/ email from co-counsel; review subsequent correspondence/ email from Court's Senior Clerk; draft memorandum; call from Las Vegas counsel (Verrichio) re status and strategy; draft memorandum; review correspondence/ email from Dr. Patel; draft correspondence/ email re same. | 1.00 | \$725.00 | \$725.00 |
| 11/22/2017 | JP | Receive and review Order on class settlement from Court and related correspondence with Mr. Massey, Mr. Couhig, and clients | 0.80 | \$425.00 | \$340.00 |
| 11/22/2017 | JL | Review Court's order and work on correspondence to clients. | 1.10 | \$550.00 | \$605.00 |
| 11/22/2017 | DM | Review correspondence/ email exchanges with counsel; review ECF court communication; review executed order; draft correspondence/ email to all direct clients; confer and review correspondence/ email from Dr. Latterman; review correspondence/ email from Dr. Patel; draft responsive correspondence/ email; review correspondence/ email from Dr. Duhaney; draft memorandum. | 1.70 | \$725.00 | \$1,232.50 |
| 11/27/2017 | JL | Calls with lawyers for class members. | 0.40 | \$550.00 | \$220.00 |
| 11/27/2017 | DM | Confer class counsel; confirm notice agent engaged | 0.10 | \$725.00 | \$72.50 |
| 11/28/2017 | JL | Calls with clients. Work on scheduling and deadlines pursuant to Court order. | 1.40 | \$550.00 | \$770.00 |
| 11/28/2017 | JL | Monitor bankruptcy and analyze responsibilities. | 0.50 | \$550.00 | \$275.00 |
| 11/28/2017 | DM | Review correspondence/ email from Ryan Allen re status; review correspondence/ email from Dr. Latterman; confer re class notice; coordinate deadlines; confer CP team re strategy re tax opinion and related information communication; review MHT Bankruptcy deadline for POC; review correspondence/ email from BR court; draft memorandum; draft correspondence/ email; confer CP team re strategy. | 2.80 | \$725.00 | \$2,030.00 |
| 11/29/2017 | JL | Conference call with Ryan Allen and Dana Campbell. Review issues raised in call. | 1.60 | \$550.00 | \$880.00 |
| 11/29/2017 | DM | Communication from attorney Allen; communication from Dr. Latterman; draft responsive correspondence/ email re same; conferences with Ryan Allen and Dana Campbell; draft memorandum; confer re notice issues; review correspondence/ email from Dr. Latterman re [REDACTED]; [REDACTED]; assess and draft responsive correspondence/ email; review correspondence/ email from Campbell to AC counsel, and review responsive correspondence/ email. | 2.60 | \$725.00 | \$1,885.00 |
| 12/01/2017 | JL | Correspondence to opposing counsel. Review notice and order provisions. Work on Intervention. | 0.60 | \$550.00 | \$330.00 |
| 12/04/2017 | JP | Review notices drafted by counsel for Ascentium | 0.40 | \$425.00 | \$170.00 |

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| 12/04/2017 | JL | Review proposed notices. | 0.50 | \$550.00 | \$275.00 |
| 12/04/2017 | JL | Prepare for call with all counsel. Confer with team re same and notices. Correspondence to Leslie Latterman. | 0.80 | \$550.00 | \$440.00 |
| 12/04/2017 | DM | Review and analysis of draft notice; assess BR issues; multiple communications with multiple class counsel | 2.40 | \$725.00 | \$1,740.00 |
| 12/05/2017 | JP | Conference call and draft evaluation for Dr. McCoy regarding [REDACTED] | 1.40 | \$425.00 | \$595.00 |
| 12/05/2017 | JL | Prepare for and participate in status call. Work on revisions to notices. Work on intervention. Confer with Latterman and Guillot. | 5.10 | \$550.00 | \$2,805.00 |
| 12/05/2017 | DM | Prepare for and attend conference calls with internal team re notice and MHT BR issues; attend conference call with AC counsel re class notice and related issues; confer; conference with Joshua Bennett; review multiple correspondence/ email from MDs re status and strategy. | 2.10 | \$725.00 | \$1,522.50 |
| 12/06/2017 | JP | Correspondence with Dr. Bhagia, Dr. Alexander, and Mr. Massey regarding [REDACTED]; Review Intervention | 0.90 | \$425.00 | \$382.50 |
| 12/06/2017 | JL | Confer with Dr. Patel. Work on notices language. Conference call with opposing counsel re status and notices. Work on motion to intervene and complaint in intervention. Telephone with Dr. Guillot. | 6.20 | \$550.00 | \$3,410.00 |
| 12/06/2017 | DM | Review intervention pleadings, Guillot; review notice consent pleadings; review and confer re CPA/ tax background; assess same; draft memorandum; draft correspondence to team re tax background; | 1.80 | \$725.00 | \$1,305.00 |
| 12/07/2017 | JP | Review information for specific clients related to settlement; Conferences with CPAs and clients; Receive and review correspondence from Dr. Lubbos | 2.10 | \$425.00 | \$892.50 |
| 12/07/2017 | JL | Work on complaint in intervention. Work on final approval issues. | 2.50 | \$550.00 | \$1,375.00 |
| 12/07/2017 | DM | Review correspondence/ email from AC counsel re consent on communication to court; draft correspondence/ email re same; review correspondence/ email exchanges among counsel; review correspondence/ email to Court's senior clerk re proposed order; review correspondence/ email re Lubbos claim; review correspondence/ email from Melby re [REDACTED]; review | 1.90 | \$725.00 | \$1,377.50 |
| 12/08/2017 | JP | Correspondence with Mr. Massey regarding CPAs | 0.20 | \$425.00 | \$85.00 |
| 12/08/2017 | JL | Work on complaint in intervention. Work on analysis for raised objections. | 2.30 | \$550.00 | \$1,265.00 |
| 12/08/2017 | DM | Confer and draft correspondence/ email re CPA consultant issues; review materials and confer re conference call with clients; draft memorandum. | 1.30 | \$725.00 | \$942.50 |

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| 12/11/2017 | JL | Work on complaint in intervention. | 0.80 | \$550.00 | \$440.00 |
| 12/11/2017 | DM | Review multiple correspondence/ email exchanges re coordination of conference call; review ECF correspondence/ email from court, and review Court's order re notice; review materials re feedback from class members. | 1.60 | \$725.00 | \$1,160.00 |
| 12/12/2017 | JP | Receive and review order approving class notice; Conference with Dr Nacol; and conference with CPA about tax implications | 0.80 | \$425.00 | \$340.00 |
| 12/12/2017 | JL | Prepare for conference call with physicians. | 1.90 | \$550.00 | \$1,045.00 |
| 12/12/2017 | DM | Confer and prepare for client conference call. | 0.80 | \$725.00 | \$580.00 |
| 12/13/2017 | JP | Legal research [REDACTED] and conference with Mr. Lemann regarding same | 0.70 | \$425.00 | \$297.50 |
| 12/13/2017 | JL | Prepare for and participate in conference call with all Univest/Ascentium docs and Dr. Eric Sandy. | 3.70 | \$550.00 | \$2,035.00 |
| 12/13/2017 | DM | Confer and coordinate re conference call with clients; prepare for and participate in lengthy call with AC/Univest clients; confer CP. | 3.90 | \$725.00 | \$2,827.50 |
| 12/14/2017 | JP | Conference with CPA; fact investigation and draft information sheet for class members related to the settlement terms | 3.40 | \$425.00 | \$1,445.00 |
| 12/14/2017 | JL | Telephone conference with Dr. Patel re [REDACTED]. Telephone with Dr. Belay re [REDACTED]. Telephone with counsel Phil Varrecchio. Work on Lubbos assessment. Draft Motion to Intervene and Complaint and distribution correspondence. Work on analysis of benefits of settlement. | 4.60 | \$550.00 | \$2,530.00 |
| 12/14/2017 | DM | Review draft compliant of intervention to name class rep for subclass; review correspondence/ email exchanges re Balboa; confer re conference call with doctors; review correspondence/ email exchanges re tax background piece; confer. | 1.40 | \$725.00 | \$1,015.00 |
| 12/15/2017 | JP | Receive and review correspondence from Dr. Amin and others and related fact investigation; Draft information sheet for clients and potential class members | 3.00 | \$425.00 | \$1,275.00 |
| 12/15/2017 | JL | Work on correspondence to class members. Work on intervention. | 1.60 | \$550.00 | \$880.00 |
| 12/15/2017 | DM | Review multiple correspondence/ email exchanges re possible settlement information sheet; assess; confer CP team; review multiple correspondence/ email exchanges re feedback from class members; confer. | 2.40 | \$725.00 | \$1,740.00 |
| 12/18/2017 | JP | Review bankruptcy notice document from Dr. Patel; Legal research regarding [REDACTED] | 1.10 | \$425.00 | \$467.50 |

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| 12/18/2017 | DM | Confer re class member feedback; assess status; review proposed intervention; coordinate team meeting; review correspondence/ email re MHT BR; draft memorandum. | 0.60 | \$725.00 | \$435.00 |
| 12/19/2017 | JP | Legal research regarding [REDACTED] | 1.50 | \$425.00 | \$637.50 |
| 12/19/2017 | DM | Confer re feedback received; coordinate team meeting; multiple correspondence/ email exchanges. | 0.40 | \$725.00 | \$290.00 |
| 12/20/2017 | JP | Conferences with potential class members; legal research on UCC statutes and finance leases and related issues | 4.10 | \$425.00 | \$1,742.50 |
| 12/20/2017 | JL | Work on legal analysis to offer in response to objections. Telephone with Dr. Lubbos re [REDACTED]. | 1.90 | \$550.00 | \$1,045.00 |
| 12/20/2017 | DM | Call from Matt Stammel re proposed single settlement prior to class fairness determination; confer class team re proposal to settle single claim; draft memorandum; coordinate team meeting; correspondence/ email exchanges re CPA consultant re background piece; confer; assess how to communicate tax issues; confer re settlement issues; review correspondence/ email exchanges re Motion to Intervene (adding new sub-class rep); review correspondence/ email exchanges re feedback and issues re class members; | 3.20 | \$725.00 | \$2,320.00 |
| 12/21/2017 | JP | Legal research regarding [REDACTED]; Conference with Mr. Couhig, Mr. Massey, and Mr. Lemann regarding strategy, bankruptcy, and related issues | 1.30 | \$425.00 | \$552.50 |
| 12/21/2017 | JL | Team meeting to discuss materials to present to class, MHT bankruptcy and moving for final approval and other topics. Work on analysis for potential objections. | 1.20 | \$550.00 | \$660.00 |
| 12/21/2017 | RC | Conference with CP team to discuss strategy, bankruptcy, etc. | 0.60 | \$775.00 | \$465.00 |
| 12/22/2017 | JP | Conference with Mr. Simpson; Correspondence with Mr. Simpson regarding settlement agreement | 0.50 | \$425.00 | \$212.50 |
| 12/22/2017 | DM | Call from Dr. Simpson re settlement; review correspondence/ email from CP re conference with Simpson; review Simpson materials; draft correspondence/ email re same. | 0.70 | \$725.00 | \$507.50 |
| 12/26/2017 | JL | Review correspondence from client. | 0.20 | \$550.00 | \$110.00 |
| 12/26/2017 | DM | Review correspondence/ email exchanges from MDs; confer CP team; draft memorandum; review Balboa consent in CA re licensure issues; | 1.10 | \$725.00 | \$797.50 |
| 12/27/2017 | JP | Research [REDACTED] | 0.60 | \$425.00 | \$255.00 |
| 12/27/2017 | JL | Draft, finalize and file the motion to Intervene and Complaint in Intervention. | 1.40 | \$550.00 | \$770.00 |
| 12/27/2017 | DM | Draft memorandum; review correspondence/ email from AC counsel re supplemental mailing by Analytics to corporate gaurantors; confer CP; | 0.90 | \$725.00 | \$652.50 |

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| 12/28/2017 | JL | Look into notice issue. Work on motion for final approval. | 0.60 | \$550.00 | \$330.00 |
| 12/28/2017 | DM | review correspondence/ email exchanges re Dr. Belay; call to counsel in Houston re status; review correspondence/ email exchanges re Dr. Belay's communications re licenses. | 0.60 | \$725.00 | \$435.00 |
| 12/28/2017 | JP | Conference with Dr. Belay | 0.50 | \$425.00 | \$212.50 |
| 12/29/2017 | JL | Telephone with Jai Patel and Tim Van Mol. Correspond with Jordan Leu regarding multiple notice issue. Work on motion for final approval. | 1.20 | \$550.00 | \$660.00 |
| 01/02/2018 | DM | Review correspondence/ email re communications with various MDs; call from AC counsel re status and settlement issues/ questions; call with Stammel re early settlement issue; analysis [REDACTED]; confer class counsel team; draft memorandum. | 2.00 | \$725.00 | \$1,450.00 |
| 01/03/2018 | JP | Correspondence with counsel for Ascentium; and receive and review correspondence from Mr. Massey; Conference and correspondence with Dr. Hisel regarding [REDACTED] | 0.60 | \$425.00 | \$255.00 |
| 01/03/2018 | JL | Work on Hisel inquiry. | 0.40 | \$550.00 | \$220.00 |
| 01/03/2018 | DM | Confer CP; assess AC discussion; confer CP; coordinate with CPA, Courcelle, assess tax issues; draft correspondence/ email to tax CPA; review correspondence/ email exchanges with Dr. Hisel; assess same. | 1.10 | \$725.00 | \$797.50 |
| 01/04/2018 | JL | Review intervention order. Work on fairness hearing preparation. | 1.20 | \$550.00 | \$660.00 |
| 01/05/2018 | JL | Work on bankruptcy strategy and prepare for fairness hearing | 2.10 | \$550.00 | \$1,155.00 |
| 01/05/2018 | DM | Prepare for and call to CPA consultant, Al Courcelle; confer CP re Dr. Hisel; draft correspondence/ email re BR case; review materials from Court e-file; assess order re intervention; | 1.90 | \$725.00 | \$1,377.50 |
| 01/06/2018 | DM | Draft memo re possible early settlement with class members AC and Univest. | 0.20 | \$725.00 | \$145.00 |
| 01/08/2018 | JP | Review information for Dr. Daniel and reach out regarding questions; and Correspondence with claims administrator | 0.70 | \$425.00 | \$297.50 |
| 01/08/2018 | DM | Review correspondence/ email from Analytics re class member inquiry; review correspondence/ email exchange; confer CP. Balboa settlement issues - analysis. | 0.50 | \$725.00 | \$362.50 |
| 01/09/2018 | JP | Correspondence to Mr. Crouch regarding deadlines; edits to client information sheet; Legal research [REDACTED] | 1.40 | \$425.00 | \$595.00 |
| 01/09/2018 | JL | Work on plaintiffs information sheet. | 0.50 | \$550.00 | \$275.00 |
| 01/10/2018 | JL | Review correspondence re [REDACTED]. | 0.30 | \$550.00 | \$165.00 |

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| 01/12/2018 | JL | Work on inquiries from Pandey and Whitehouse. Work on plaintiff info sheet. | 1.00 | \$550.00 | \$550.00 |
| 01/16/2018 | JL | Work on Ledbetter agreement. Work on agenda for conference call. Work on approval. | 3.50 | \$550.00 | \$1,925.00 |
| 01/16/2018 | DM | Review correspondence/ email from Stammel; assess Ledbetter issues; confer CP re possibility of early settlements for class members; draft memorandum; review settlement agreement. | 1.20 | \$725.00 | \$870.00 |
| 01/17/2018 | DM | Review correspondence/ email from Dr. Kumar re [REDACTED]; coordination of meeting to confer re CPA tax background for class members; possibility of early settlements for class members and moving forward to fairness hearing and requisite filings; assess status of all issues; review correspondence/ email from Dr. Bhagia; confer CP. | 3.40 | \$725.00 | \$2,465.00 |
| 01/18/2018 | JP | Conference call regarding numerous settlement matters with Mr. Massey, Mr. Bennett, Mr. Couhig, and Mr. Lemann | 0.70 | \$425.00 | \$297.50 |
| 01/18/2018 | JL | Telephone conference on hearing preparation, class communications, and bankruptcy strategy and commemorate same. | 1.60 | \$550.00 | \$880.00 |
| 01/18/2018 | RC | Work on settlement and fairness hearing preparation. | 1.00 | \$775.00 | \$775.00 |
| 01/18/2018 | DM | Review correspondence/ email from Josh Bennett re BR motion for relief; draft memorandum; assess same; prepare for and attend team conference call; | 0.90 | \$725.00 | \$652.50 |
| 01/19/2018 | JP | Conference with Mr. Massey and correspondence with Mr. Lemann regarding objections and questions from potential class members; Conference with Dr. Obi and correspondence with Mr. Lemann regarding same | 1.30 | \$425.00 | \$552.50 |
| 01/19/2018 | JL | Work on motion for relief from stay and confer with Carter Scholer. | 0.50 | \$550.00 | \$275.00 |
| 01/19/2018 | DM | Multiple correspondence/ email exchanges from class members; assess BR issues; confer CP; draft memorandum; confer Paul Crouch; coordinate tax issues. | 1.10 | \$725.00 | \$797.50 |
| 01/22/2018 | JL | Work on inquiries from Drs Kumar, Latterman, Peters, and McPherson. Work on preparation for fairness hearing. Work on motion for final approval and application for attorneys fees. | 4.40 | \$550.00 | \$2,420.00 |
| 01/22/2018 | JP | Conference with Mr. Lemann, Mr. Massey, and Mr. Couhig regarding settlement considerations | 0.30 | \$425.00 | \$127.50 |
| 01/22/2018 | RC | Conference re fairness hearing preparation with team. | 0.30 | \$775.00 | \$232.50 |
| 01/22/2018 | DM | Correspondence/ email exchanges re CPA Courcelle and efforts to push forward re same; review correspondence/ email exchanges re 1099 questions; coordinate conference with AC counsel; draft memorandum; coordinate meeting; | 3.00 | \$725.00 | \$2,175.00 |

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| | | review correspondence/ email from Latterman and related issues; assess early settlement issues. | | | |
| 01/23/2018 | JP | Prepare for conference call with Mr. Stammel; Conference call and follow up conference and memorandum regarding pending items | 1.40 | \$425.00 | \$595.00 |
| 01/23/2018 | JP | Conference with Dr. Mann regarding settlement, and follow up correspondence, etc. | 0.90 | \$425.00 | \$382.50 |
| 01/23/2018 | JL | Prepare for conference call with defense counsel. Conference call with bankruptcy counsel. Work on approval pleadings. | 3.70 | \$550.00 | \$2,035.00 |
| 01/23/2018 | DM | Confer CP; conference with Stammel and AC counsel; assess status of BR issues; draft memorandum; confer Carter Scholer counsel; review correspondence/ email; address bankruptcy; multiple correspondence/ email exchanges; assess tax issues and status | 2.70 | \$725.00 | \$1,957.50 |
| 01/24/2018 | JP | Conferences, correspondence, and fact investigation regarding tax piece and doctors considering objections or opt outs | 1.20 | \$425.00 | \$510.00 |
| 01/24/2018 | JL | Confer with counsel for Houston group and review settlement as to them. Work on early settlement proposal. Work on motions. | 4.70 | \$550.00 | \$2,585.00 |
| 01/24/2018 | DM | Review correspondence/ email re MHT BR; draft correspondence/ email to class reps re fairness hearing; confer CP; confer Alyan Haidery; call, text and confer with Dr. Latterman; multiple conferences with CP re opt outs, tax background and related issues. | 2.90 | \$725.00 | \$2,102.50 |
| 01/25/2018 | JL | Work on class member communications. Work on motion to approve. Confer with opposing counsel and review schedules. | 2.50 | \$550.00 | \$1,375.00 |
| 01/25/2018 | DM | Materials; draft memorandum; review correspondence/ email; assess tax issues; call with Latterman; confer CP; multiple correspondence/ email to other counsel re scheduling calls; coordinate same; [REDACTED]; draft memorandum re same. | 3.50 | \$725.00 | \$2,537.50 |
| 01/26/2018 | JL | Confer Dr. Peters. Confer opposing counsel. Work on motion to approve. Work on bankruptcy. Work on draft communications to class and informational responses. Calls with multiple class member counsel. | 5.30 | \$550.00 | \$2,915.00 |
| 01/26/2018 | DM | Review correspondence/ email from Latterman re [REDACTED]; draft memorandum; draft correspondence/ email to Courcelle; assess same; coordination and attend individual conference calls with attys Tawil, Morgan, Allen and De Leon; confer CP; coordinate obtaining tax info; assess tax issues; assess opt out issues; review settlement materials; confer Dani Policarpio; review correspondence/ email exchanges re same; draft memorandum; confer Al Courcelle. | 4.40 | \$725.00 | \$3,190.00 |

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| 01/27/2018 | JP | Correspondence with Mr. Massey and Mr. Couhig regarding tax piece and potential objections | 0.50 | \$425.00 | \$212.50 |
| 01/27/2018 | JL | Confer re Dr. Wei inquiry. Review CPA report. Telephone with Dr. Patel. | 1.20 | \$550.00 | \$660.00 |
| 01/27/2018 | DM | Review correspondence/ email from CPA Betholet; assess report; confer CP; review correspondence/ email exchanges; draft correspondence/ email to Bertholet; draft correspondence/ email to CP team; review correspondence/ email re Houston doctors; review correspondence/ email exchanges re early settlement issues. | 3.20 | \$725.00 | \$2,320.00 |
| 01/28/2018 | DM | Review correspondence/ email from court's ECF; draft memorandum; review correspondence/ email from Latterman re [REDACTED]; draft correspondence/ email to CP team. | 0.70 | \$725.00 | \$507.50 |
| 01/29/2018 | JP | Draft correspondence to Mr. Stammel and related settlement fact investigation and conferences | 2.40 | \$425.00 | \$1,020.00 |
| 01/29/2018 | JL | Review discussions with bankruptcy trustee and evaluate impact on settlement. | 0.40 | \$550.00 | \$220.00 |
| 01/29/2018 | JL | Confer with Dr. Kumar. Work on motion to approve. Work on communications to class. | 4.30 | \$550.00 | \$2,365.00 |
| 01/29/2018 | RC | Participate in discussions regarding tax treatment and other potential settlement objections. | 0.50 | \$775.00 | \$387.50 |
| 01/29/2018 | DM | Review communication from Latterman; draft correspondence/ email re same; review subsequent materials from CPA Courcelle; draft memorandum; correspondence/ email to AC counsel; assess status of addressing early settlements; confer; review materials re 1099 issue; confer. | 3.30 | \$725.00 | \$2,392.50 |
| 01/30/2018 | JL | Telephone conference with Steve Latterman. Work on inquiries to claims administrator. Review CPA report. Work on communications to class members. Work on correspondence to Ascentium counsel. Work on motion for approval. | 4.30 | \$550.00 | \$2,365.00 |
| 01/30/2018 | JP | Edits to potential information piece to potential class members; Correspondence and conferences with Mr. Lemann and Mr. Massey about potential objections. | 0.80 | \$425.00 | \$340.00 |
| 01/30/2018 | DM | Confer CP re Balboa issues; review multiple correspondence/ email re tax issues; draft memorandum and draft correspondence/ email to lawyers, and draft correspondence/ email to direct clients; confer CP re Latterman; and assess claims; call from [REDACTED]; review correspondence/ email from Arnette re MHT Bankruptcy; assess same; multiple conferences and correspondence/ email exchanges re tax issues and strategy. | 3.40 | \$725.00 | \$2,465.00 |
| 01/31/2018 | JL | Work on declarations in support of motion to approve. Work on responses to lawyers and class members. | 4.00 | \$550.00 | \$2,200.00 |

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| 02/01/2018 | JP | Draft correspondence and conference with Mr. Massey regarding tax issues | 0.30 | \$425.00 | \$127.50 |
| 02/01/2018 | JL | Review tax opinion letter and cover to outside counsel. Work on declarations for fairness hearing. | 3.30 | \$550.00 | \$1,815.00 |
| 02/02/2018 | DM | Multiple conferences among CP counsel re correspondence/ email from several doctors and counsel; draft memorandum; review correspondence/ email from Dr. Latterman; draft memorandum; review correspondence/ email from expert Courcelle's association; draft memorandum; review and assess 1099 issues; review correspondence/ email from Morgan; review correspondence/ email from De Leon; draft correspondence/ email; confer Alayan Haidery; confer; review correspondence/ email from CPA Bertholot; draft memorandum | 3.80 | \$725.00 | \$2,755.00 |
| 02/02/2018 | JL | Confer with Kirk Morgan and Don Massey. Review new draft of tax opinion. | 0.60 | \$550.00 | \$330.00 |
| 02/02/2018 | RC | Conferences with Mr. Massey regarding correspondence from several doctors and counsel | 0.60 | \$775.00 | \$465.00 |
| 02/04/2018 | DM | Review materials from Eric De Leon and others; review status of AC/ Univest response to 1099 issue | 0.70 | \$725.00 | \$507.50 |
| 02/05/2018 | JP | Correspondence, conferences, and review of filings and documents related to objections and settlement developments | 0.60 | \$425.00 | \$255.00 |
| 02/05/2018 | DM | Confer CP; review objections from class members filed into record; draft memorandum; calls from Latterman; review correspondence/ email from atty Sandoval (El Paso); draft memorandum; draft correspondence/ email; review correspondence/ email from Josh Bennett re call from atty Ed Price (Lubbock); draft memorandum; review multiple correspondence/ email from class members re issues and objections; confer; call to Stammel; draft correspondence/ email to Stammel and Leu; call from Crouch; | 4.50 | \$725.00 | \$3,262.50 |
| 02/05/2018 | JL | Legal research [REDACTED]. Work on responses to objections. | 2.20 | \$550.00 | \$1,210.00 |
| 02/05/2018 | RC | Conferences with Mr. Massey regarding numbers issues and review objections from class members | 0.40 | \$775.00 | \$310.00 |
| 02/06/2018 | JL | Review objections and work on response. Work on motion in support. Review [REDACTED]. Work on responses to doctor inquiries and confer with settlement administrator. Legal research [REDACTED]. Review 1099 letters. | 5.70 | \$550.00 | \$3,135.00 |
| 02/06/2018 | JP | Correspondence with Mr. Massey and clients regarding 1099s | 0.40 | \$425.00 | \$170.00 |
| 02/06/2018 | DM | Call with Stammel; call from Ed Price; call from Paul Crouch; call from Dr. Latterman; call from Roberto Sandoval (atty, El Paso); call from Ed Price (atty Lubbock); call from Audrey Leeder (atty Dallas); confer CP; review multiple | 8.60 | \$725.00 | \$6,235.00 |

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| | | correspondence/ email from class members; review correspondence/ email from AC re 1099 issue; review correspondence/ email from Univest counsel re 1099 issue; draft multiple correspondence/ email to class member personal counsel re fee issues; draft memorandum; re class member objections; review correspondence/ email from attorneys for doctos, and draft responsive correspondence/ email; review correspondence/ email from Latterman; draft responsive correspondence/ email; confer re briefing of class fairness. | | | |
| 02/06/2018 | RC | Conferences with Mr. Massey and review multiple correspondences with class members, attorneys, and others related to settlement matters | 1.10 | \$775.00 | \$852.50 |
| 02/07/2018 | JP | Conference with Mr. Tyson regarding [REDACTED]; and related correspondence with Mr. Massey | 0.30 | \$425.00 | \$127.50 |
| 02/07/2018 | DM | Conferences with CP: confer Tawil; confer Morgan; call to Allen; review correspondence/ email from court EFS; review objections submitted; confer CP and Leon Carter; draft correspondence/ email; review correspondence/ email from Roberto Sanoval; review materials from Sandaval client; draft memorandum; draft correspondence/ email re early settlement possiblity; review materials re tax issue; call from Renee Hoelscheer; review and assess Bar Order proposed by MHT; draft memorandum; confer re same. | 2.00 | \$725.00 | \$1,450.00 |
| 02/07/2018 | JL | Work on tax opinion. Work on Kedar inquiry. Work on Rivera inquiry. Research [REDACTED]. Work on correspondence to clients. | 3.10 | \$550.00 | \$1,705.00 |
| 02/07/2018 | RC | Conferences and correspondence with Mr. Massey and review correspondences related to recent filings and fairness hearing | 0.20 | \$775.00 | \$155.00 |
| 02/08/2018 | JP | Correspondence and conferences with doctors regarding settlement details | 0.40 | \$425.00 | \$170.00 |
| 02/08/2018 | DM | Assess Bar Order; confer and address same; all with Stammel; confer CP; review correspondence/ email from Stammel and AC counsel re Bar Order; review correspondence/ email from CP re Bar Order; review amended language draft; assess; review objection by Dr. Obi; assess; call with Sandoval re Monroy claims and related issues; draft memorandum; review correspondence/ email from Morgan; confer CP; | 3.70 | \$725.00 | \$2,682.50 |
| 02/08/2018 | JL | Work on negotiations and edits re bar order and the motion for. Work on Hisel questions. Work on Riviera inquiry. Confer with Jordan and review jurisprudence. Confer with Josh Bennett. | 3.60 | \$550.00 | \$1,980.00 |
| 02/08/2018 | RC | Correspondence with Mr. Massey and review numerous correspondences related to settlement matters | 0.30 | \$775.00 | \$232.50 |

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| 02/09/2018 | DM | Review correspondence/ email exchanges with Sandoval; review draft motion for approval; draft memorandum; draft correspondence/ email to CP; call from Stammel re Mann objection; review objections; draft memorandum; review materials; | 2.30 | \$725.00 | \$1,667.50 |
| 02/09/2018 | JL | Work on motions and declarations in connection with fairness hearing. Correspondence and research re same. | 2.70 | \$550.00 | \$1,485.00 |
| 02/10/2018 | DM | Review motion for final approval and related materials; review research re [REDACTED]; review research re [REDACTED]; | 1.30 | \$725.00 | \$942.50 |
| 02/11/2018 | DM | Call from attorney Roberto Sandoval (El Paso, TX); assess issues re possible opt outs; confer CP re inquiry from AC counsel re Dr. Mann objection; review and assess Morgan email. | 1.00 | \$725.00 | \$725.00 |
| 02/12/2018 | DM | Review and analysis of materials re bar order; assess case law; confer Kirk Morgan; confer AC counsel; call to Ryan Allen; review correspondence/ email re BR status (CP to Arnette); review correspondence/ email from Dr. Latterman; review correspondence/ email from Eric Sandy; call from atty from Oxford MS (Dee) re status of settlement; review correspondence/ email re email lists | 2.40 | \$725.00 | \$1,740.00 |
| 02/12/2018 | JL | Work on bankruptcy filing. Work on Peters inquiry. Work on Bar Order issues. Work on approval motion. | 1.30 | \$550.00 | \$715.00 |
| 02/13/2018 | DM | Review correspondence/ email from settlement administrator; confer; draft responsive correspondence/ email re hard copy signatures for opt outs; review materials from Sandoval; assess class settlement issues, and opt out status; review objections; confer re process for follow up with objectors; call from attorney Price (Lubbock) | 3.00 | \$725.00 | \$2,175.00 |
| 02/13/2018 | JL | Work on bar order drafts and negotiation | 2.00 | \$550.00 | \$1,100.00 |
| 02/14/2018 | DM | Review correspondence/ email from Sandoval; draft responsive correspondence/ email; confer attorney Price (Lubbock); draft memorandum to class counsel team; assess Ryan Allen status, and draft correspondence/ email to class counsel; review correspondence/ email from Allen; draft memorandum; review revisions to Bar Order; review correspondence/ email from Lemann; review correspondence/ email exchanges with aligned counsel; draft memorandum; review multiple correspondence/ email exchanges with lawyer Dana Campbell; review correspondence/ email from Kirk Morgan (MI counsel) re [REDACTED]; draft correspondence/ email to AC counsel; draft memorandum; review materials from Dee; draft correspondence/ email to AC counsel; review multiple correspondence/ email exchanges re same; draft materials re Oxford doctors materials; review correspondence/ email from attorney Sandoval; draft responsive correspondence/ email | 6.80 | \$725.00 | \$4,930.00 |

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| 02/14/2018 | JL | Work on Bar order. Discussions with Kirk Morgan and Ryan Allen and Eric De Leon. Work on motions. | 1.80 | \$550.00 | \$990.00 |
| 02/14/2018 | RC | Review numerous correspondences related to settlement matters | 0.40 | \$775.00 | \$310.00 |
| 02/15/2018 | JP | Correspondence and conferences with potential class members and related attorneys | 0.60 | \$425.00 | \$255.00 |
| 02/15/2018 | DM | Multiple correspondence/ email and conferences; assess opt out issues; review correspondence/ email from BR attorney; review correspondence/ email from Sandoval; draft correspondence/ email re same; confer CP; review draft of motion for final approval; assess bar order drafts and cases; review multiple correspondence/ email; confer Dr. Melby re hearing; draft correspondence/ email to Melby re objections; | 4.50 | \$725.00 | \$3,262.50 |
| 02/15/2018 | JL | Confer with Kirk Morgan and Dana Campbell. Confer with Jordan Leu and work on bar order. Work on fairness hearing preparation. Work on POCs for class. | 2.70 | \$550.00 | \$1,485.00 |
| 02/16/2018 | JP | Correspondence with potential settling doctors | 0.60 | \$425.00 | \$255.00 |
| 02/16/2018 | DM | Review correspondence/ email from BR attorney; confer Kirk Morgan (MI); confer Ryan Allen (Dallas); call to Eric De Leon (San Antonio); call to Stammel; review and confer re bar order; assess impact under various scenarios; review ECF notices re Bar Order; review and confer pleadings; confer P. Crouch (DFW) | 2.20 | \$725.00 | \$1,595.00 |
| 02/16/2018 | JL | Work on bar order and motion. Work on proof of claim. Work on motions. Confer with Josh Bennett. | 3.10 | \$550.00 | \$1,705.00 |
| 02/17/2018 | DM | Correspondence/ email to Jordan Leu re attorney Hobbs clients (Oxford, MS) re IPA and related materials; assess and review research re class rep enhancements; draft memorandum; assess De Leon status; review correspondence/ email from Leu; draft responsive correspondence/ email; draft correspondence/ email to attorney Hobbs; review IPAs; assess same | 1.80 | \$725.00 | \$1,305.00 |
| 02/18/2018 | DM | Review correspondence/ email from CPA Courcelle's office; draft memorandum; draft correspondence/ email re same; assess status of Sandoval claims; review draft motion for approval; review correspondence/ email from Bhagia re [REDACTED]; | 2.60 | \$725.00 | \$1,885.00 |
| 02/18/2018 | JL | Review tax attorney opinion. Work on declarations and motion for final approval and for fees. | 3.60 | \$550.00 | \$1,980.00 |
| 02/19/2018 | JP | Conference with potential class member regarding Ascentium settlement terms | 0.40 | \$425.00 | \$170.00 |
| 02/19/2018 | JL | Work on motions. LR incentive awards. | 4.40 | \$550.00 | \$2,420.00 |
| 02/19/2018 | DM | Review correspondence/ email re Houston and El Paso docs; draft memorandum; confer Stammel re MI doctors objection, Dallas doctors and settlement related issues; assess opt out | 5.30 | \$725.00 | \$3,842.50 |

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| | | issues; call to attorney Ryan Allen (Dallas/ Plano); call to attorney Eric De Leon (San Antonio); draft correspondence/ email to attorney Sandoval (El Paso); review materials re fairness hearing briefing; confer re fee application for other lawyers in case; assess issues central to fee applications; confer attorney De Leon (San Antonio); draft memorandum; review [REDACTED]; | | | |
| 02/19/2018 | CG | Meet with JPL re Motion to Approve Settlement | 0.30 | \$390.00 | \$117.00 |
| 02/19/2018 | RC | Review numerous correspondences related to settlement and settlement filings | 0.70 | \$775.00 | \$542.50 |
| 02/20/2018 | JP | Receive and review correspondence from co-counsel regarding settlement details and correspondence from potential class members | 0.40 | \$425.00 | \$170.00 |
| 02/20/2018 | JL | Work on motions and proof of claim. Work on responses to objections and class member inquiries. | 3.80 | \$550.00 | \$2,090.00 |
| 02/20/2018 | DM | Review correspondence/ email from Morgan; review correspondence/ email from De Leon; review tax document; confer Lemann; review CP communications; review objection; assess; draft memorandum; assess opt out issues; | 0.80 | \$725.00 | \$580.00 |
| 02/20/2018 | CG | Edit in Motion to Approve Settlement | 2.00 | \$390.00 | \$780.00 |
| 02/20/2018 | RC | Receive, review, and respond to correspondence from Mr. Massey on several settlement matters | 0.20 | \$775.00 | \$155.00 |
| 02/21/2018 | JL | Work on responses to objections. Work on Holliday inquiry. Work on motion for final approval and attorneys fees. Telephone conference with Dr. Kumar. Work on fairness hearing preparation. Telephone conference with Matt Stammel. Work on tax attorney opinion and calls the same. | 6.10 | \$550.00 | \$3,355.00 |
| 02/21/2018 | DM | Analysis of tax opinion forwarded by attorney De Leon (San Antonio); correspondence/ email from attorney Kirk Morgan (Michigan); confer Morgan; correspondence/ email to CPA Courcelle; coordinate conference call; email exchanges with Stammel (AC); draft responsive correspondence/ email; coordinate call with Stammel; assess; review correspondence/ email from Morgan; confer Morgan; draft correspondence/ email to Stammel; confer Stammel re multiple issues; confer Morgan following Stammel discussion; multiple correspondence/ email exchanges with class counsel team re De Leon tax materials; confer CPA Courcelle; draft memorandum; confer attorney Sandoval (El Paso); draft memorandum to class counsel team; review ECF filing re objection of Holliday, Renda; review correspondence/ email ECF re enrollment of Michigan counsel pro hac vice; confer re opt outs; | 8.10 | \$725.00 | \$5,872.50 |
| 02/21/2018 | JP | Receive, review, and edit motion for final approval; Receive and review court filings and correspondence regarding settlement | 3.80 | \$425.00 | \$1,615.00 |

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| 02/21/2018 | CG | Edit Motion to Approve Settlement | 0.70 | \$390.00 | \$273.00 |
| 02/21/2018 | RC | Review draft motion to approve | 0.40 | \$775.00 | \$310.00 |
| 02/22/2018 | JL | Calls with Morgan Broaddus. Confer with Jordan Leu. Prepare response to tax opinion letter. Telephone with Al Courcelle. Work on declarations and motions for fairness hearing and attorney fees. Confer with Settlement Administrator. Work on preparation for Fairness Hearing. Work on proofs of claim. Confer with Josh Bennett. | 5.80 | \$550.00 | \$3,190.00 |
| 02/22/2018 | DM | Draft correspondence/ email to De Leon re tax opinion; draft memorandum seeking review and comments on draft from CPA and class counsel team; review correspondence/ email re Jack Read (S.Car); review correspondence/ email from Dee Hobbs (MS) re client settlements; draft responsive correspondence/ email; | 2.60 | \$725.00 | \$1,885.00 |
| 02/22/2018 | JP | Correspondence with plaintiffs and co-counsel regarding fairness hearing, settlement matters, and motions for fairness hearing | 0.70 | \$425.00 | \$297.50 |
| 02/22/2018 | JP | Preparation of and edits to documents and memorandum for fairness hearing | 0.60 | \$425.00 | \$255.00 |
| 02/22/2018 | CG | Edit Legal Citations in Motion to Approve Settlement | 1.50 | \$390.00 | \$585.00 |
| 02/23/2018 | JL | Work on motions. Confer with Jordan Leu re Multiple guarantors. Review Hermosa objection and work on response. Review tax opinion and participate on multiple calls re Same. | 4.20 | \$550.00 | \$2,310.00 |
| 02/23/2018 | DM | Review correspondence/ email from De Leon; coordinate class reps meeting prior to hearing; confer Ryan Allen re status of possible opt outs; assess same; review multiple correspondence/ email re MHT bankruptcy filing; confer CP re call with Mitchell, AC counsel and other; review correspondence/ email from attorney Kirk Morgan (MI); assess same; call with Morgan; call with Couhig; assess status of tax discussion; confer CP; call from Latterman; review correspondence/ email re opt outs; review correspondence/ email and draft of components of motion to approve; | 4.70 | \$725.00 | \$3,407.50 |
| 02/23/2018 | JP | Review and edit Massey Declaration | 2.00 | \$425.00 | \$850.00 |
| 02/23/2018 | CG | Edit Massey MHT Declaration | 1.70 | \$390.00 | \$663.00 |
| 02/23/2018 | RC | Conferences with Mr. Massey regarding several settlement matters | 0.60 | \$775.00 | \$465.00 |
| 02/24/2018 | DM | Correspondence/ email to attorney Allen (DFW) re fee application and status; draft correspondence/ email to attorney Tawil (McAllen) re fee application and status; draft correspondence/ email to attorney Morgan (MI) re fee application and status; confer CP re opt out related issues and fee applications; confer Ike Tawil; confer Dana Campbell; | 3.20 | \$725.00 | \$2,320.00 |

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| | | review correspondence/ email from Kirk Morgan; multiple conferences with Lemann re briefing issues. | | | |
| 02/24/2018 | RC | Conferences and correspondence with Couhig team regarding opt out related issues and fee applications | 0.30 | \$775.00 | \$232.50 |
| 02/25/2018 | DM | Review correspondence/ email from Dr. Rettig; draft memorandum to Lemann and Pastorek re status; review fee application materials; review and revise motion for approval; review correspondence/ email from Court re Order on pro hac admission for Michigan counsel; confer Kirk Morgan re fee application and objections; review draft motion to approve and briefing memorandum; draft revisions to same; correspondence/ email exchanges with CP; review draft Massey Declaration; draft revisions to same; draft correspondence/ email among class counsel team; draft correspondence/ email re MI doctor possible objections and status of fee applications for non-class counsel; confer Morgan; review correspondence/ email and draft correspondence/ email to CP team | 4.70 | \$725.00 | \$3,407.50 |
| 02/25/2018 | CG | Edit and Organize Citations in Motion to Approve Settlement; Review Massey Declaration edits/comments | 2.10 | \$390.00 | \$819.00 |
| 02/26/2018 | DM | Review correspondence/ email from Dr. Latterman; confer and draft correspondence/ email/ text message re tax issues; confer Eric De Leon; assess [REDACTED]; assess [REDACTED]; review correspondence/ email with Settlement Administrator; assess [REDACTED]; assess objections; review correspondence/ email from Morgan re MI doctors; draft memorandum to CP; review records re Balboa MDs opt out position; draft memorandum; assess status and strategy; coordinate same; review Massey Declaration and revise; review materials from Carter, Scholer re fees and costs; review MHT BR filing; review correspondence/ email from AC counsel requesting extension of time for BR trustee to object to bar order; assess same; review draft of motion to approve; draft correspondence/ email to Ryan Allen; call from De Leon; assess status of claims; review objection for Dr. Arnaud; draft memorandum; review earlier objection; review scanned objections from settlement administrator; correspondence/ email exchanges with Arnette (BR Atty with Carter Scholer); review correspondence/ email from attorney Morgan Broadus re intention to opt out S.Car. physician group; assess facts; coordinate briefing; review correspondence/ email from Latterman; draft responsive correspondence/ email re opt outs | 6.40 | \$725.00 | \$4,640.00 |
| 02/26/2018 | JL | Work on fairness hearing motions and declarations. Work on bankruptcy filings on behalf of the class. Work on responses to various class members. Correspondence with opposing counsel. Confer with settlement administrators and review exclusion notices. Confer with outside counsel re common benefit applications. | 6.30 | \$550.00 | \$3,465.00 |

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| 02/26/2018 | CG | Verify all legal authority cited in Motion to Approve Settlement | 1.50 | \$390.00 | \$585.00 |
| 02/26/2018 | JP | Preparation of and edits to documents and memoranda for fairness hearing | 5.90 | \$425.00 | \$2,507.50 |
| 02/26/2018 | RC | Review and respond to correspondence and memoranda from Mr. Massey on settlement matters | 0.60 | \$775.00 | \$465.00 |
| 02/27/2018 | JL | Work on declarations. Work on bar order extension. Work on motions in connection with fairness hearing. Confer with attorneys seeking common benefit. Correspond with objector re Hermosa. Work on other class inquiries. Call with Stammel. Confer with settlement administrator and review exclusions. | 6.50 | \$550.00 | \$3,575.00 |
| 02/27/2018 | DM | Review settlement agreement and related pleadings re opt out threshold and related issues; review Massey Declaration and revise; draft memorandum; review updated draft of Motion to Approve; review correspondence/ email from attorney Kirk Morgan (MI); review materials re same; review correspondence/ email from AC counsel re trustee bar order extension; assess same; correspondence/ email exchanges re same; review correspondence/ email from CPA Courcelle; draft memorandum, and draft correspondence/ email re same; review correspondence/ email from settlement administrator; review subsequent correspondence/ email; assess opt out forms provided; review AC spreadsheets of loan values and gaurantors; confer re same; assess opt outs and assess threshold; review multiple correspondence/ email exchanges among CP team; call with Lemann and Stammel; assess spreadsheet of opt outs; review memorandum re Dr. Amin (opt out) materials; confer claimant David Webster; draft correspondence/ email re same; review Dr. Amin materials; draft correspondence/ email to Dr. Amin re exclusion request; draft memorandum | 6.70 | \$725.00 | \$4,857.50 |
| 02/27/2018 | JP | Preparation of and edits to documents and memoranda for fairness hearing | 7.40 | \$425.00 | \$3,145.00 |
| 02/27/2018 | CG | Verify all legal authority cited in Motion to Approve Settlement | 2.00 | \$390.00 | \$780.00 |
| 02/27/2018 | RC | Correspondence and conferences with Couhig team regarding recent filings with the settlement administrator and other settlement matters | 0.40 | \$775.00 | \$310.00 |
| 02/28/2018 | CG | Edit all portions of Motion to Approve Settlement | 2.00 | \$390.00 | \$780.00 |
| 02/28/2018 | DM | Review correspondence/ email re Hermosa Home Visits MHT; assess same; review multiple correspondence/ email re opt out status and interrelationship of opt out claimants; confer Stammel and Lemann; multiple conferences with CP class team; review correspondence/ email from Settlement Administrator re opt outs for 2/28/2018; review drafts of Massey Declarations; updates to opt out lists; assess process for addressing opt out claimants or counsel (if represented); | 5.60 | \$725.00 | \$4,060.00 |

| | | | | | |
|------------|----|---|------|----------|------------|
| | | review correspondence/ email from Stammel re Allen "opt ins;" review Allen 8/17/2017 client listing; assess exclusions, draft correspondence/ email to CP team; multiple conferences re opt outs, settlement agreement provisions and related issues | | | |
| 02/28/2018 | JP | Edits to Massey Declaration | 1.50 | \$425.00 | \$637.50 |
| 02/28/2018 | JL | Work on fairness hearing motions. Work on Hermosa correspondence. Telephone conference with Stammel. Review notices and confer with settlement administrator. Confer Tawil. | 6.10 | \$550.00 | \$3,355.00 |
| 02/28/2018 | RC | Correspondence and conferences with Couhig team regarding settlement administrator filings and other settlement matters | 0.50 | \$775.00 | \$387.50 |
| 03/01/2018 | RC | Conference with Mr. Massey, Mr. Pastorek, and Mr. Lemann regarding class member responses and fairness hearing; Conference call with counsel for defendant and Couhig Partners team | 1.10 | \$775.00 | \$852.50 |
| 03/01/2018 | JP | Conference with Mr. Couhig, Mr. Massey, and Mr. Lemann regarding class member responses and fairness hearing; Conference call with counsel for defendant and Couhig Partners team | 1.10 | \$425.00 | \$467.50 |
| 03/01/2018 | JL | Work on Fairness Hearing submissions. Confer with Settlement Administrator and review opt outs. Conference call with AC counsel. | 4.40 | \$550.00 | \$2,420.00 |
| 03/01/2018 | DM | Review correspondence/ email from settlement administrator re opt outs received; assess total opt outs and assess same; coordinate settlement issues; confer CP; confer AC counsel; review settlement agreement; review correspondence/ email from attorney Sandoval; draft memorandum; draft correspondence/ email to Sandoval; review correspondence/ email from attorney De Leon; draft memorandum; confer attorney Crouch; review correspondence/ email/ text re same; draft correspondence/ email; confer CP re opt out status; review Efile notice, and review communication with Court by Renda Holloday; assess same; review brief revisions; correspondence/ email exchanges with Leon Carter and Paul Crouch; multiple conferences with CP lawyers. | 5.50 | \$725.00 | \$3,987.50 |
| 03/02/2018 | JP | Receive and review correspondence from potential class members; Prepare for MHT call, including review of exclusions and related data; Conference with Couhig team and defense counsel and related meetings and discussions | 3.00 | \$425.00 | \$1,275.00 |
| 03/02/2018 | JL | Conference calls with AC counsel. Work on fairness hearing briefs. Confer with Settlement Administrator. Review opt outs. | 5.40 | \$550.00 | \$2,970.00 |
| 03/02/2018 | RC | Conference with Couhig team and defense counsel and related document review and meetings and discussions with Massey and others | 3.10 | \$775.00 | \$2,402.50 |

| | | | | | |
|------------|----|--|------|----------|------------|
| 03/02/2018 | DM | Multiple communications with CP; review and assess opt outs and threshold issues; assess prior communications; coordinate strategy re addressing opt out; confer re addressing objectors on various issues; review materials; assess same; review correspondence/ email from Settlement administrator; assess single new opt out; confer and coordinate CP re discussions with AC counsel; multiple conferences with AC counsel and related issue; draft memorandum re same; coordinate; multiple conferences with AC counsel (Stammel and Leu); | 5.30 | \$725.00 | \$3,842.50 |
| 03/03/2018 | RC | Numerous conferences and correspondences related to negotiations with Ascentium | 2.10 | \$775.00 | \$1,627.50 |
| 03/03/2018 | DM | Review correspondence/ email from AC; review opt outs, and review settlement agreement; assess opt out issues; confer and address opt outs; confer CP; multiple conferences with AC counsel; coordinate fairness hearing issues. | 2.60 | \$725.00 | \$1,885.00 |
| 03/04/2018 | JL | Work on Fairness Hearing Submissions. | 3.20 | \$550.00 | \$1,760.00 |
| 03/04/2018 | RC | Additional numerous conferences and correspondences related to negotiations with Ascentium | 2.90 | \$775.00 | \$2,247.50 |
| 03/04/2018 | DM | Review Massey Declaration; review correspondence/ email from Josh Bennett re Leon Carter Declaration; confer re same; review correspondence/ email/ text from Paul Crouch; draft memorandum; draft responsive correspondence/ email; review materials re attachments to Declarations; revise; review correspondence/ email from Settlement Administrator re draft Declaration re notice; assess same; draft memorandum; coordinate filing of Settlement Administrator Declaration; confer CP re opt outs and ongoing discussions with AC; confer and coordinate; | 3.80 | \$725.00 | \$2,755.00 |
| 03/05/2018 | JP | Receive and review correspondence from Mr. Massey, Mr. Lemann, and Mr. Couhig regarding fairness hearing information from class members, and filings; additional preparation of fairness hearing filings; conferences with Mr. Massey, Mr. Couhig, and Mr. Lemann | 6.30 | \$425.00 | \$2,677.50 |
| 03/05/2018 | RC | Additional numerous conferences and correspondences related to negotiations with Ascentium, including several conferences with Couhig team and defense counsel | 4.10 | \$775.00 | \$3,177.50 |
| 03/05/2018 | JL | Finalize and file motion for approval of settlement and motion for fees and expenses. Calls with Leu. Confer with settlement administrator and review report. Review latest opt outs and objections. | 8.80 | \$550.00 | \$4,840.00 |
| 03/05/2018 | DM | Review and finalize motion to approve settlement; confer and address agreement on opt out; confer and address revisions to motion to award fee; multiple conferences with CP re logistics for hearing, filing of pleadings, and related issues; confer attorney Crouch; final revisions to Massey Declaration; execute; review correspondence/ email from attorney Morgan; draft responsive correspondence/ email; | 7.80 | \$725.00 | \$5,655.00 |

| | | | | | |
|------------|----|--|------|----------|------------|
| | | review message from Dr. Latterman; review all objections; confer re additional communications with objectors prior to hearing; review multiple court filing system correspondence/ email; review two additional objections; review filed motion for final approval and review filed appendix; draft correspondence/ email to attorneys Morgan and Tawil re motion to approve class and appendix; draft correspondence/ email to counsel re motion to award fees; call from Dr. Latterman; draft memorandum re communication with direct clients; confer; multiple correspondence/ email exchanges with Settlement Administrator re Declaration; confer re same; confirm whether AC agrees; assess same; coordinate additional conferences with objectors; analysis of objections; address logistics for hearing. | | | |
| 03/06/2018 | JP | Draft declarations for clients, appendix, and other filings for fairness hearing; preparation for fairness hearing | 2.60 | \$425.00 | \$1,105.00 |
| 03/06/2018 | RC | Conferences with Mr. Massey, Mr. Lemann, and Mr. Pastorek regarding numerous matters related to the fairness hearing; review recent filings in preparation for fairness hearing | 2.30 | \$775.00 | \$1,782.50 |
| 03/06/2018 | JL | Work on fairness hearing preparation. Confer with clients. Work on bar order issues. | 2.10 | \$550.00 | \$1,155.00 |
| 03/06/2018 | DM | Confer CP re objections; review correspondence/ email from Court filing system, and review objection; compile listing of objections, and assess same; confer Crouch; confer and assess; coordinate logistics for hearing in Dallas; assess; confer Kirk Morgan; assess issues. | 3.20 | \$725.00 | \$2,320.00 |
| 03/07/2018 | JP | Preparation for fairness hearing, draft correspondence to objectors, fact investigation re objectors, conferences with Mr. Couhig and Mr. Massey | 3.60 | \$425.00 | \$1,530.00 |
| 03/07/2018 | RC | Conferences with Mr. Massey, Mr. Lemann, and Mr. Pastorek regarding numerous matters related to the fairness hearing; contact objectors to discuss fairness hearing and settlement | 3.10 | \$775.00 | \$2,402.50 |
| 03/07/2018 | JL | Work on response to objectors. Confer with Leu. Work on Settlement Administrator dec and file. | 1.30 | \$550.00 | \$715.00 |
| 03/07/2018 | DM | Multiple correspondence/ email exchanges re objectors; confer attorney Reed; calls to objectors; coordinate and draft multiple communications to all objectors; draft correspondence/ email to specific objectors; multiple conferences with AC counsel; confer re filing of AC exhibits addressing class members; review AC appendix; draft memorandum; review correspondence/ email; review jurisprudence; | 4.60 | \$725.00 | \$3,335.00 |
| 03/08/2018 | JP | Review response to Motion for Final Approval; Conferences with Couhig team; Draft partial proposed declaration language; Draft memorandum related to conferences with objectors; other preparation for hearing | 5.40 | \$425.00 | \$2,295.00 |

| | | | | | |
|------------|----|---|------|--------------------------|-----------------------|
| 03/08/2018 | RC | Conferences with Mr. Massey, Mr. Lemann, and Mr. Pastorek regarding numerous matters related to the fairness hearing; review recent filings in preparation for fairness hearing; conferences with objecting class members; conferences with counsel for Ascentium | 5.90 | \$775.00 | \$4,572.50 |
| 03/08/2018 | JL | Work on bar order issues. Work on appendix for hearing. Review settling defendants brief. Conversations with multiple objectors. Prepare for hearing. Confer with clients and work on inquiries from objectors. | 3.90 | \$550.00 | \$2,145.00 |
| 03/08/2018 | DM | Review correspondence/ email from Stammel; draft responsive correspondence/ email; confer CP; conferences with AC counsel; conference with Court's clerk; confer re objectors; conference with objector Holloway; conference with staff person for Dr. Hermosa; review and assess objectors; calls to and from objectors; draft memoranda re objector status; review and revise class rep declarations; review correspondence/ email exchanges with AC counsel re bar order; multiple conferences with CP team. | 5.70 | \$725.00 | \$4,132.50 |
| | | | | Services Subtotal | \$1,785,948.00 |

Expenses

| Date | Description | Quantity | Rate | Total |
|------------|--|----------|------------|------------|
| 01/04/2017 | Filing Fee-Texas Secretary of State | 1.00 | \$2.05 | \$2.05 |
| 01/12/2017 | Travel-hotel - Hilton Garden Suites | 1.00 | \$119.08 | \$119.08 |
| 01/12/2017 | mileage to and from McAllen (686 X 2 | 1.00 | \$734.02 | \$734.02 |
| 01/14/2017 | Filing Fee-Texas Secretary of State | 1.00 | \$2.05 | \$2.05 |
| 01/14/2017 | Filing Fee-Texas Secretary of State | 1.00 | \$4.11 | \$4.11 |
| 01/24/2017 | Travel-Airfare to and from Charlotte | 1.00 | \$793.00 | \$793.00 |
| 01/24/2017 | Travel-Hotel-Sheraton Charlotte Airport | 1.00 | \$271.99 | \$271.99 |
| 04/22/2017 | Travel-Airfare to and from Houston | 1.00 | \$275.89 | \$275.89 |
| 05/15/2017 | Filing Fee-Superior Court of California | 1.00 | \$9.46 | \$9.46 |
| 05/17/2017 | Shipping-Federal Express, Inv 5-813-50280 | 1.00 | \$28.76 | \$28.76 |
| 06/30/2017 | Michael Dickerson, Inv 190, Financial and Spreadsheet Analysis | 1.00 | \$3,280.00 | \$3,280.00 |
| 07/13/2017 | Mileage to/from Bankruptcy Cred.Hearing in Plano, TX | 1.00 | \$387.34 | \$387.34 |
| 07/14/2017 | Hotel - Aloft Plano | 1.00 | \$129.67 | \$129.67 |
| 07/18/2017 | Christopher Nolland, Attorney-Mediator | 1.00 | \$4,500.00 | \$4,500.00 |
| 07/27/2017 | Travel-Southwest | 1.00 | \$594.96 | \$594.96 |

| | | | | |
|--------------------------|---|------|--------------------|------------|
| 07/27/2017 | Southwest Airlines | 1.00 | \$593.96 | \$593.96 |
| 07/27/2017 | Hotel Indigo | 1.00 | \$178.27 | \$178.27 |
| 08/01/2017 | Michael Dickerson, Inv 199, Financial and Spreadsheet Analysis | 1.00 | \$2,100.00 | \$2,100.00 |
| 08/02/2017 | Transcription Costs-SHRR | 1.00 | \$89.90 | \$89.90 |
| 08/06/2017 | Travel-Delta Airlines | 1.00 | \$378.20 | \$378.20 |
| 08/06/2017 | Holiday Inn Express, Charlotte, MI | 1.00 | \$99.22 | \$99.22 |
| 08/06/2017 | Avis Rent A Car (1/2) | 1.00 | \$156.62 | \$156.62 |
| 08/09/2017 | Mileage - NOLA-HOU (364 Miles) DAL (254 Miles) | 1.00 | \$603.48 | \$603.48 |
| 08/10/2017 | Hotel - Courtyard - I-10 Energy Corridor | 1.00 | \$148.59 | \$148.59 |
| 08/11/2017 | Inn at Lampasas, TX | 1.00 | \$96.05 | \$96.05 |
| 08/13/2017 | Southwest Airlines - MSY-SAT-MSY | 1.00 | \$701.16 | \$701.16 |
| 09/22/2017 | 09/14-15/2017 1/2 Costs of trip: MSY-DFW Southwest Airlines, Hotel Embassy Suites, Meal with Ryan, Parking NOLA | 1.00 | \$492.61 | \$492.61 |
| 09/30/2017 | Michael Dickerson, Inv 204, Financial and Spreadsheet Analysis | 1.00 | \$960.00 | \$960.00 |
| 02/26/2018 | Courcelle Consulting - Tax services related to formulating opinion letter and other tax research to notify potential class members of the tax implications of the proposed settlement | 1.00 | \$3,498.75 | \$3,498.75 |
| 03/06/2018 | E110 Out-of-town travel: Flight from Charlotte, NC to Dallas, TX for Derek Melby-MHT Fairness Hearing | 1.00 | \$1,013.09 | \$1,013.09 |
| 03/06/2018 | E110 Out-of-town travel: Flight from New Orleans, LA to Dallas, TX for Jonathan Lemann-MHT Fairness Hearing | 1.00 | \$628.60 | \$628.60 |
| 03/06/2018 | E110 Out-of-town travel: Flight from New Orleans, LA to Dallas, TX for Rob Couhig Jr.-MHT Fairness Hearing | 1.00 | \$728.61 | \$728.61 |
| 03/06/2018 | E110 Out-of-town travel: Flight from New Orleans, LA to Dallas, TX for Robert Couhig, III-MHT Fairness Hearing | 1.00 | \$636.60 | \$636.60 |
| 03/10/2018 | E110 Out-of-town travel: Mileage - NOLA to DAL (499 Miles) | 1.00 | \$546.09 | \$546.09 |
| 03/10/2018 | E110 Out-of-town travel: Lodging for attorneys and witnesses for fairness hearing | 1.00 | \$1,998.32 | \$1,998.32 |
| Expenses Subtotal | | | \$26,780.50 | |

| Time Keeper | Quantity | Rate | Total |
|--------------------|-----------------|-------------|--------------|
| Rob Couhig | 142.5 | \$775.00 | \$110,437.50 |
| Jeremy Fischbach | 17.5 | \$390.00 | \$6,825.00 |
| Cory Grant | 33.2 | \$390.00 | \$12,948.00 |

| | | | |
|-----------------|--------|----------|-----------------------|
| Jonathan Lemann | 751.0 | \$550.00 | \$413,050.00 |
| Don Massey | 1460.4 | \$725.00 | \$1,058,790.00 |
| Jeff Pastorek | 432.1 | \$425.00 | \$183,642.50 |
| Tate Martin | 3.4 | \$75.00 | \$255.00 |
| Subtotal | | | \$1,812,728.50 |
| Total | | | \$1,812,728.50 |

Detailed Statement of Account

Current Invoice

| Invoice Number | Due On | Amount Due | Payments Received | Balance Due |
|---------------------------------|------------|----------------|-------------------|-----------------------|
| 2343 | 04/08/2018 | \$1,812,728.50 | \$0.00 | \$1,812,728.50 |
| Outstanding Balance | | | | \$1,812,728.50 |
| Amount in Trust | | | | \$0.00 |
| Total Amount Outstanding | | | | \$1,812,728.50 |

Please make all amounts payable to: COUHIG PARTNERS, LLC Tax ID #20-3926170

Exhibit 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**DR. DEREK MELBY, and DANILO
POLICARPIO as individuals and on
behalf of all others similarly situated**

Plaintiffs,

v.

**AMERICA'S MHT, INC., SCOTT
POSTLE, ACENTIUM CAPITAL, LLC,
and CLIFF MCKENZIE**

Defendants.

Case No. 3:17-cv-155

**DECLARATION OF E. LEON CARTER IN SUPPORT OF APPLICATION FOR
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, E. Leon Carter, declare as follows:

1. I am a member of the firm of Carter Scholer PLLC. I submit this declaration in support of my firm's application for an award of attorneys' fees in connection with the services we provided in this case, and for the reimbursement of expenses that we incurred in filing this case.
2. Carter Scholer is counsel for plaintiffs and class representatives, Dr. Derek Melby, Dr. Danilo Policarpio, Dr. David Guillot and Dr. Jaideep Patel.
3. The identification and background of my firm, its partners and associates, who devoted substantial time to this matter, is attached hereto as Exhibit A.

4. The total number of hours spent on this litigation by my firm is 153.4 hours, which equals \$99,320 based my firm's hourly rates and the lodestar. A breakdown of the lodestar is as follows:

Inception through February 28, 2018

| ATTORNEY* | * | HOURS | RATE | LODESTAR |
|---------------------|----------|--------------|-------------|-----------------|
| E. Leon Carter | P | 64.6 | \$800 | \$51,680 |
| J. Robert Arnett II | P | 44 | \$650 | \$28,600 |
| Joshua J. Bennett | P | 44.8 | \$425 | \$19,040 |
| TOTAL: | | 153.4 | | \$99,320 |

* (P) = Partner

5. My firm performed several services for the benefit of our clients and the Class. We investigated the facts supporting the allegations in the Complaint by reviewing documents, conducting interviews, and researching the parties and witnesses. We responded to class member inquiries, and preparation and filing of the Complaint and Amended Complaint and other pleadings and motions, and the negotiation of the Partial Class Settlement.

6. My firm incurred a total of \$2,210.37 in unreimbursed expenses in connection with the prosecution of this litigation. These expenses are broken down as follows:

EXPENSES

From Inception through January 31, 2018

| | |
|---|---------|
| Filing Fees | \$1,600 |
| Pro Hac Vice Fees | \$150 |
| Postage | \$19.37 |
| Court Fees (e.g. service of process, miscellaneous filing fees) | \$441 |

7. The expenses incurred pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred. See billing records attached Exhibit B hereto.

8. I have been an attorney practicing in Dallas for more than 25 years and a managing partner of my firm since it opened in 2012.

9. I have reviewed all declarations and exhibits submitted along with this Motion for an Approval of Attorney Fee Award.

10. The rates reflected in the declarations and exhibits are reasonable and within the market range for comparably qualified attorneys practicing in Dallas in a complex case like this one.

11. I understand that rate sheets for the state may reflect a lower rate. But, in my experience, those rates are geared more toward less complex cases, such as commercial contract disputes or insurance-related cases. A case like this one, that involves many different parties and conspirators and many complex transactions between the victims and the defendants, warrants much higher rates. There are many firms in Dallas that would charge much higher rates to pursue or defend a case like this one, which would also be reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 3, 2018



E. Leon Carter

Exhibit LC-A

CARTER SCHOLER

Carter Scholer PLLC is a litigation and intellectual property firm in Dallas, Texas. We represent clients in a variety of industries, including banking, financial services, telecommunications, electronics, technology, oil and gas, document management, municipalities, insurance, and consumer goods. We represent numerous clients in state and federal courts in Texas, across the United States and before the United States Patent and Trademark Office.

Our firm combines years of expertise with excellent legal representation and exceptional client service. Respected, recognized, and results-oriented, our firm is the solution to your legal needs.

Our practice areas include: business litigation; complex tort litigation; intellectual property litigation; insurance matters; and labor & employment matters.



Representative Experience
Business Litigation

- Fraud/ breach of fiduciary duty action involving corporate officers, directors, and shareholders.
- Employment-related matters including benefits, severance, and discrimination claims as well as non-compete and non-disclosure agreements and misappropriation of trade secrets issues.
- Representation of telecommunications company in breach of contract case. Obtained verdict for all amounts sought after four-day jury trial.
- Negotiating and securing the first ten (10) year high-tech pioneer tax status ever awarded to any technology joint venture by the Malaysian government. Negotiating and obtaining initial financing from governmental agencies, venture capital, and financial institutions in Malaysia for the \$20 million dollar project.
- Represented landlord in dispute involving commercial lease of multi-million dollar property.
- Representation of medical provider in multi-million dollar breach of contract and fraud action involving medical billings and collections.
- Represented commercial real estate broker in suit involving fraud and misrepresentation pertaining to exclusive listing agreement and commercial real estate broker's fee.
- Represented broker/dealer in multi-million dollar securities fraud investigation and arbitration.
- Represented numerous entities in high-value collections, suits on accounts, promissory notes, guaranty agreements, and deeds of trust.
- Obtained summary judgment, without any discovery, for client who obtained interest in oil and gas leases at a foreclosure sale on Plaintiff's claims that foreclosure sale was invalid and that client was required to share its interest in the oil and gas leases with Plaintiff.

**CARTER
SCHOLER**

Representative Experience
Construction Litigation

- Represented major U.S. airline in litigation matters involving removal and replacement of defective terrazzo floors in newly constructed airport terminal and defective construction of taxiway subgrade and concrete pavement.
- Lead trial counsel for plaintiff seeking damages for breach of architectural services contract for design of jail.
- Defended claims of negligent construction of the University of Texas Southwest Medical Center Research Facility.
- Successfully defended breach of roofing contract claim in binding arbitration on behalf of roofing contractor.
- Successfully mediated claims made by electrical subcontractor against general contractor involving luggage handling conveyor system at international airport.
- Obtained favorable judgment as lead trial counsel for breach of construction contract claim involving defective scaffolding.
- Successfully mediated claims made by concrete subcontractor against general contractor involving construction of office building.
- Lead counsel responsible for recovering declaratory judgment on behalf of insurance company against an additional insured in the amount of \$1 million arising out of personal injury from explosion.
- Defended breach of painting subcontract action involving Disney World luxury apartment project brought by general contractor. Successfully resolved dispute in ADR process.
- Pursued subrogation claims on behalf of large insurer arising out of public water supply project in Oklahoma.
- Lead counsel for drywall subcontractor in arbitration action pursuing claims of construction delay and interference damages against general contractor.
- Lead counsel for general contractor in breach of construction contract claim involving alleged defective construction of roof.

Senior Counsel John Torkelson has been selected to serve on the American Arbitration Association's National Panel of Construction Neutrals.

**CARTER
SCHOLER**

Representative Experience
Employment Litigation

- Represented the City of Dallas and the Chief of Police of the Dallas Police Department in an appeal before the U.S. Court of Appeals for the Fifth Circuit that affirmed the trial court's award of summary judgment.
- Obtained summary judgment in favor of the City of Dallas on age, gender and race discrimination under Title VII, ADEA, 42 U.S.C. § 1983, and the Texas Commission on Human Rights Act.
- Obtained summary judgment in favor of Fortune 500® company on race discrimination, hostile work environment and retaliation claims under Title VII.
- Obtained summary judgment in favor of Fortune 500® company on FMLA retaliation claim.
- Part of trial team that obtained "take nothing" judgment in defense of race, age and national origin discrimination claims against Fortune 500® company and individuals under Title VII and the Texas Commission on Human Rights Act.
- Assisted with defense of multi-million dollar government contractor, company officers, and employees in debarment proceedings initiated by the Department of Labor, Wage and Hour Division.
- Assisted with defense of financial institution in proceedings initiated by the Department of Labor, Office of Federal Contract Compliance Programs Division.

We have also provided counsel and representation in administrative proceedings, state court and federal court in employment-related disputes concerning Title VII, the Americans with Disabilities Act, Age Discrimination in Employment Act, Family Medical Leave Act, Fair Labor Standards Act, Service Contract Act, and employment agreements. Additionally, we review and prepare policies and procedures and Affirmative Action Plans for employers.



Representative Experience
Insurance Litigation

- Representing hundreds of insureds of numerous insurance companies, including serving as counsel for Farmers Insurance Group and Zurich North America Insurance.
- Successfully defended numerous jury trials involving insurance-related matters, including premises liability, personal and commercial auto, personal and commercial property, business disparagement, defamation and coverage issues.
- Representing and counseling numerous clients in insurance coverage disputes, insurance recovery claims, and bad faith DTPA actions. Such matters include coverage disputes and bad faith/DTPA actions involving property/casualty, personal auto, homeowner, health, commercial general liability, director & officer, errors & omissions, and other types of policies and coverages.

CARTER SCHOLER

Representative Experience **Insurance Litigation**

Copyright Litigation

- Representation of online consumer goods business in Digital Millennium Copyright Act matter in the Eastern District of Texas. Obtained a swift, favorable settlement.
- Representation of doctors in copyright infringement matter involving the Digital Millennium Copyright Act in the Northern District of Texas.

Patent Litigation

- Representation of major telecommunications and wireless device manufacturer in patent infringement suit involving a system and method for transmission of data and contact alerts for unconnected users. Case settled on confidential terms a couple of weeks before trial in the Eastern District of Texas.
- Representation of medical benefits virtual payment provider in patent infringement suit in the Northern District of Texas. Successful appeal to the Federal Circuit on issue of inventorship under the Declaratory Judgment Act.
- Representation of large, multinational oilfield services company in patent infringement suit involving downhole well tool products in the Northern District of Texas.
- Representation of US-based multinational document management company in patent infringement suit in the Eastern District of Texas.
- Representation of major telecommunications and wireless device manufacturer in patent infringement suit involving digital image preview technology in the Northern District of Texas.
- Representation of 3D design software company in patent infringement case in the Northern District of Texas.
- Representation of global financial services company in patent infringement case in the Eastern District of Texas and appellate proceedings in the Federal Circuit.
- Representation of major telecommunications and wireless device manufacturer in patent infringement suit involving data transmission in the Northern District of Texas.

Trademark Litigation

- Representation of mining company in cancellation proceedings before the Trademark Trial and Appeal Board and in related court proceedings in the Northern District of Texas.
- Representation of accounting firm in federal court proceedings against a global tax services firm in the Northern District of Texas.
- Representation of German software company in cancellation proceedings before the Trademark Trial and Appeal Board.



Representative Experience
Insurance Litigation

- Representation of Texas-based financial research and consulting firm in opposition proceedings before the Trademark Trial and Appeal Board. Obtained a favorable settlement.
- Negotiated favorable coexistence agreement for financial services company in proceedings before the Trademark Trial and Appeal Board.
- Representation of network security company in opposition proceedings before the Trademark Trial and Appeal Board.

Principals

- E. Leon Carter
- Karen Gren Scholer
- J. Robert Arnett II

Partners

- Joshua J. Bennett
- Scott W. Breedlove
- Courtney B. Perez
- Oscar Rey Rodriguez
- Linda R. Stahl

Senior Counsel

- John S. Torkelson
- Jennifer C. Wang

Associates

- Stacey C. Hernandez

Senior Of Counsel

- Judge Gary Hall

Exhibit LC-B

Time Entries**Carter Scholer PLLC**

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Status = Approved
 View = Original
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Task | Professional | Start | Stop | Duration | Rate | Amount |
|--|----------|----------|--------------|--|--------------------|-------|------|----------|--------|----------|
| <i>Melby, Kumar, Bhagia and Patel, et al.</i> | | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | | |
| 01-17-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 3.200 | 800.00 | 2,560.00 |
| | | | | Participate in conference call; receive and review emails; review draft of lawsuit; communications with co-counsel (M) | | | | | | |
| 01-17-2017 | Approved | | Billable | | Bennett, Joshua | | | 5.600 | 425.00 | 2,380.00 |
| | | | | Analyze possible RICO claim and revise and finalize complaint (M) | | | | | | |
| 01-19-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.200 | 425.00 | 85.00 |
| | | | | Communications with co-counsel regarding service (M) | | | | | | |
| 01-20-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.600 | 425.00 | 255.00 |
| | | | | Communications with co-counsel regarding potential class members and service issues (M) | | | | | | |
| 01-23-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.100 | 425.00 | 42.50 |
| | | | | Communications with potential clients and co-counsel (M) | | | | | | |
| 01-24-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.300 | 425.00 | 127.50 |
| | | | | Communications with potential clients and co-counsel (M) | | | | | | |
| 02-02-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.600 | 425.00 | 255.00 |
| | | | | Outline issues with employee witness and offer of documents along with Rule 202 petition and potential use in gathering evidence (M) | | | | | | |
| 02-06-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 0.400 | 800.00 | 320.00 |
| | | | | Communications with defense counsel (M) | | | | | | |
| 02-07-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 0.400 | 800.00 | 320.00 |
| | | | | Communications with defense counsel (M) | | | | | | |
| 02-10-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 2.700 | 800.00 | 2,160.00 |
| | | | | Review brief in support of TRO (M) | | | | | | |
| 02-13-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.100 | 425.00 | 42.50 |
| | | | | Attention to TRO issues (M) | | | | | | |
| 02-14-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.800 | 425.00 | 765.00 |
| | | | | Analyze TRO and related motions and outline issues in connection with the same (M) | | | | | | |
| 02-15-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.600 | 425.00 | 680.00 |
| | | | | Revise TRO and motion for expedited discovery (M) | | | | | | |
| 02-16-2017 | Approved | | Billable | | Bennett, Joshua | | | 5.000 | 425.00 | 2,125.00 |
| | | | | Revise TRO motion, motion for expedited discovery, and motion to expedite consideration; compile appendix; finalize motions for filing; communications with court regarding the same (M) | | | | | | |
| 03-01-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.300 | 425.00 | 127.50 |
| | | | | Attention to TRO response (M) | | | | | | |
| 03-06-2017 | Approved | | Billable | | Bennett, Joshua | | | 3.700 | 425.00 | 1,572.50 |
| | | | | Revise reply in support of various motions and supplemental appendices to the same (M) | | | | | | |
| 03-09-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.800 | 425.00 | 765.00 |
| | | | | Analyze draft complaint and revise the same (K) | | | | | | |

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Time Entries**Carter Scholer PLLC**

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Status = Approved
 View = Original
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Task | Professional | Start | Stop | Duration | Rate | Amount |
|--|----------|----------|--------------|--|--------------------|-------|------|----------|--------|----------|
| <i>Melby, Kumar, Bhagia and Patel, et al.</i> | | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | | |
| 03-10-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.300 | 425.00 | 552.50 |
| | | | | Revise draft complaint (K) | | | | | | |
| 03-13-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.900 | 425.00 | 382.50 |
| | | | | Revise complaint (K) | | | | | | |
| 03-27-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.500 | 425.00 | 212.50 |
| | | | | Revise class complaint (B) | | | | | | |
| 03-28-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.500 | 425.00 | 637.50 |
| | | | | Finalize complaint for filing (B) | | | | | | |
| 03-30-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.400 | 425.00 | 170.00 |
| | | | | Attention to transfer of case (B) | | | | | | |
| 04-05-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.900 | 425.00 | 382.50 |
| | | | | Attention to consolidation issues (P) | | | | | | |
| 04-07-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.200 | 425.00 | 510.00 |
| | | | | Draft notice of non-opposition (M) | | | | | | |
| 04-17-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.300 | 425.00 | 127.50 |
| | | | | Communications with co-counsel regarding [REDACTED] | | | | | | |
| 04-21-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.400 | 425.00 | 170.00 |
| | | | | Communications with co-counsel regarding calls with doctors concerning amended complaint (M) | | | | | | |
| 04-25-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.500 | 425.00 | 212.50 |
| | | | | Analyze settlement issues and issues of ratification (M) | | | | | | |
| 04-28-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.200 | 425.00 | 85.00 |
| | | | | Finalize motion for extension of time (M) | | | | | | |
| 05-31-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.500 | 425.00 | 212.50 |
| | | | | Class settlement and expert issues (M) | | | | | | |
| 06-26-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 0.500 | 800.00 | 400.00 |
| | | | | Communications with co-counsel (M) | | | | | | |
| 06-29-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 0.400 | 800.00 | 320.00 |
| | | | | Receive and review communication from D. Massey (M) | | | | | | |
| 07-14-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.500 | 425.00 | 212.50 |
| | | | | Analyze settlement options | | | | | | |
| 08-06-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 1.500 | 800.00 | 1,200.00 |
| | | | | Participate in conference call; review Global Class complaint | | | | | | |
| 08-07-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 1.800 | 800.00 | 1,440.00 |
| | | | | Telephone conferences with defense counsel regarding filing motion with the court extending the deadlines; telephone conferences with court coordinator; receive and review motion | | | | | | |

Time Entries**Carter Scholer PLLC**

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Status = Approved
 View = Original
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Task | Professional | Start | Stop | Duration | Rate | Amount |
|--|----------|----------|--------------|---|--------------------|-------|------|----------|--------|----------|
| <i>Melby, Kumar, Bhagia and Patel, et al.</i> | | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | | |
| 08-07-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.800 | 425.00 | 765.00 |
| | | | | Revise amended complaint | | | | | | |
| 08-08-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.700 | 425.00 | 297.50 |
| | | | | Analyze issues related to class settlement and indemnity | | | | | | |
| 08-11-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 2.400 | 800.00 | 1,920.00 |
| | | | | Meet with D. Massey; meet with D. Massey and R. Allen | | | | | | |
| 08-16-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 1.300 | 800.00 | 1,040.00 |
| | | | | Review stipulation of settlement | | | | | | |
| 08-18-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 1.200 | 800.00 | 960.00 |
| | | | | Review stipulation of dismissal | | | | | | |
| 08-18-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.000 | 425.00 | 425.00 |
| | | | | Attention to issues concerning release of Ascentium and class claims against Ba boa and Univest | | | | | | |
| 08-22-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 0.700 | 800.00 | 560.00 |
| | | | | Receipt and review of letter from M. Stammel | | | | | | |
| 08-23-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 0.600 | 800.00 | 480.00 |
| | | | | Review of correspondence to defense counsel | | | | | | |
| 08-25-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 1.200 | 800.00 | 960.00 |
| | | | | Review of communications from M. Stammel; communications with co-counsel | | | | | | |
| 09-01-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 3.800 | 800.00 | 3,040.00 |
| | | | | Communications with co-counsel; review first amended and supplemental class action complaint | | | | | | |
| 09-04-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 2.900 | 800.00 | 2,320.00 |
| | | | | Receive and review various emails; review email regarding 30(b)(6) issues | | | | | | |
| 09-04-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.500 | 425.00 | 212.50 |
| | | | | Attention to amended complaint | | | | | | |
| 09-05-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.500 | 425.00 | 212.50 |
| | | | | Analyze class certification issues | | | | | | |
| 09-05-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 3.600 | 800.00 | 2,880.00 |
| | | | | Review and revise stipulation of settlement; communications with defense counsel; communications with co-counsel | | | | | | |
| 09-05-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 2.800 | 800.00 | 2,240.00 |
| | | | | Receive and review stipulation of settlement; communications with co-counsel | | | | | | |
| 09-06-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.500 | 425.00 | 212.50 |
| | | | | Attention to amended complaint | | | | | | |
| 09-12-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 3.900 | 800.00 | 3,120.00 |
| | | | | Participate in conference call with counsel of record; communications with M. Stammel; participate in call with D. Massey and J. Lemann; review draft stipulation of settlement | | | | | | |

Time Entries**Carter Scholer PLLC**

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Status = Approved
 View = Original
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Task | Professional | Start | Stop | Duration | Rate | Amount |
|--|----------|----------|--------------|---|--------------------|-------|------|----------|--------|----------|
| <i>Melby, Kumar, Bhagia and Patel, et al.</i> | | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | | |
| 09-13-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 2.700 | 800.00 | 2,160.00 |
| | | | | Communications with D. Massey and J. Lemann; review draft stipulation; participate in conference call; review emails from defense counsel | | | | | | |
| 09-14-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 4.200 | 800.00 | 3,360.00 |
| | | | | Telephone conference J. Lemann; preparation for conference call; participate in conference calls; review documents; review proposed order | | | | | | |
| 09-15-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 2.700 | 800.00 | 2,160.00 |
| | | | | Communications with D. Massey and J. Lemann; communications with M. Stammell; review exhibits | | | | | | |
| 09-18-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 2.400 | 800.00 | 1,920.00 |
| | | | | Communications with co-counsel; telephone conferences with J. Lemann; communications with opposing counsel | | | | | | |
| 09-20-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 3.600 | 800.00 | 2,880.00 |
| | | | | Numerous telephone calls with co-counsel; participate in conference calls with counsel of record | | | | | | |
| 09-25-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 1.200 | 800.00 | 960.00 |
| | | | | Review final version of stipulation of settlement | | | | | | |
| 09-26-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 1.300 | 800.00 | 1,040.00 |
| | | | | Communications with co-counsel; review final draft | | | | | | |
| 09-26-2017 | Approved | | Billable | | Bennett, Joshua | | | 2.000 | 425.00 | 850.00 |
| | | | | Finalize motion, memorandum, and stipulation of settlement | | | | | | |
| 10-25-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.600 | 425.00 | 255.00 |
| | | | | Communications with opposing counsel regarding status of court's approval of class settlement | | | | | | |
| 11-21-2017 | Approved | | Billable | | Carter, Edgar Leon | | | 0.600 | 800.00 | 480.00 |
| | | | | Telephone conference with Matt Stammell; participate in call with the court | | | | | | |
| 12-05-2017 | Approved | | Billable | | Bennett, Joshua | | | 1.000 | 425.00 | 425.00 |
| | | | | Analyze intervenor and class issues in light of bankruptcy deadlines | | | | | | |
| 12-14-2017 | Approved | | Billable | | Bennett, Joshua | | | 0.300 | 425.00 | 127.50 |
| | | | | Analyze intervenor petition in light of bankruptcy issues | | | | | | |
| 01-05-2018 | Approved | | Billable | | Arnett II, Bob | | | 2.700 | 650.00 | 1,755.00 |
| | | | | Review district court pleadings and bankruptcy court pleadings to prepare motion for relief from stay | | | | | | |
| 01-08-2018 | Approved | | Billable | | Arnett II, Bob | | | 2.700 | 650.00 | 1,755.00 |
| | | | | Review bankruptcy pleadings and filings; review stipulation of settlement and order preliminarily approving class settlement | | | | | | |
| 01-09-2018 | Approved | | Billable | | Arnett II, Bob | | | 3.800 | 650.00 | 2,470.00 |
| | | | | Pursue questions regarding procedural history; prepare motion for relief from automatic stay | | | | | | |
| 01-10-2018 | Approved | | Billable | | Arnett II, Bob | | | 5.800 | 650.00 | 3,770.00 |
| | | | | Prepare motion for relief from automatic stay; conduct legal research regarding relief from automatic stay; review bankruptcy pleadings; revise motion for relief from automatic stay | | | | | | |

Time Entries**Carter Scholer PLLC**

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 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
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 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Task | Professional | Start | Stop | Duration | Rate | Amount |
|--|----------|----------|--------------|---|--------------------|-------|------|----------|--------|----------|
| <i>Melby, Kumar, Bhagia and Patel, et al.</i> | | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | | |
| 01-18-2018 | Approved | | Billable | | Arnett II, Bob | | | 0.200 | 650.00 | 130.00 |
| | | | | Pursue status of motion for relief from automatic stay | | | | | | |
| 01-18-2018 | Approved | | Billable | | Bennett, Joshua | | | 1.100 | 425.00 | 467.50 |
| | | | | Attention to fairness hearing and issues related to bankruptcy | | | | | | |
| 01-19-2018 | Approved | | Billable | | Arnett II, Bob | | | 1.700 | 650.00 | 1,105.00 |
| | | | | Review email and edits from J. Lemann; confer with A. Chiarello regarding motion for relief from stay; prepare email to A. Chiarello regarding certificate of conference; confer with L. Levick regarding motion for relief from stay; prepare notice of appearance and efile; prepare proposed order; revise motion for relief from stay and efile | | | | | | |
| 01-22-2018 | Approved | | Billable | | Arnett II, Bob | | | 0.700 | 650.00 | 455.00 |
| | | | | Confer with L. Levick regarding motion for relief from stay and alleged stay violation; pursue strategy regarding response to L. Levick | | | | | | |
| 01-23-2018 | Approved | | Billable | | Arnett II, Bob | | | 2.100 | 650.00 | 1,365.00 |
| | | | | Confer with D. Massey and J. Lemann regarding issues raised by L. Levick; conduct legal research regarding stay violations | | | | | | |
| 01-24-2018 | Approved | | Billable | | Arnett II, Bob | | | 3.200 | 650.00 | 2,080.00 |
| | | | | Confer with L. Levick regarding follow-up meeting; conduct legal research regarding class action proofs of claim; conduct legal research regarding automatic stay violations | | | | | | |
| 01-25-2018 | Approved | | Billable | | Arnett II, Bob | | | 1.800 | 650.00 | 1,170.00 |
| | | | | Conduct legal research regarding class action proofs of claim; meet with L. Levick regarding proof of claim and motion for relief from stay | | | | | | |
| 01-26-2018 | Approved | | Billable | | Arnett II, Bob | | | 1.200 | 650.00 | 780.00 |
| | | | | Review case law on class action proof of claim and prepare lengthy email to L. Levick regarding same | | | | | | |
| 01-26-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 1.800 | 800.00 | 1,440.00 |
| | | | | Receive and review Bacboa Capital's motion and brief in support of dismissal | | | | | | |
| 01-29-2018 | Approved | | Billable | | Arnett II, Bob | | | 1.100 | 650.00 | 715.00 |
| | | | | Prepare agreed motion to extend time to object to lift stay motion; prepare proposed order; exchange email with R. Allen regarding lift stay motion | | | | | | |
| 01-29-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 1.900 | 800.00 | 1,520.00 |
| | | | | Communications with D. Massey; review opinion | | | | | | |
| 01-30-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 0.900 | 800.00 | 720.00 |
| | | | | Communications with co-plaintiffs' counsel; review various emails from other lawyers; review opt out letter | | | | | | |
| 01-30-2018 | Approved | | Billable | | Arnett II, Bob | | | 0.800 | 650.00 | 520.00 |
| | | | | Exchange email with L. Levick regarding motion for extension of time; revise motion and email to L. Levick; confer with R. Allen and D. Campbell regarding motion for relief from stay and underlying cases | | | | | | |
| 02-01-2018 | Approved | | Billable | | Arnett II, Bob | | | 1.200 | 650.00 | 780.00 |
| | | | | Review email from L. Levick regarding motion for extension of time; revise motion for extension of time and email to L. Levick, D. Campbell, and R. Allen; further revisions to motion and email to L. Levick, D. Campbell, and R. Allen; review email from L. Levick and D. Campbell approving motion; finalize motion and proposed order and efile same | | | | | | |
| 02-01-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 1.300 | 800.00 | 1,040.00 |

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Time Entries**Carter Scholer PLLC**

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| Date | Status | Approval | BillableType | Task | Professional | Start | Stop | Duration | Rate | Amount |
|--|----------|----------|--------------|---|--------------------|-------|------|----------------|--------|------------------|
| <i>Melby, Kumar, Bhagia and Patel, et al.</i> | | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | | |
| | | | | Receive and review tax opinion; communications with co-counsel | | | | | | |
| 02-02-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 0.400 | 800.00 | 320.00 |
| | | | | Review letter from attorney for various potential plaintiffs | | | | | | |
| 02-06-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 2.400 | 800.00 | 1,920.00 |
| | | | | Receive and review numerous emails | | | | | | |
| 02-06-2018 | Approved | | Billable | | Bennett, Joshua | | | 1.500 | 425.00 | 637.50 |
| | | | | Analyze objections to settlement and outline possible responses to such objections | | | | | | |
| 02-07-2018 | Approved | | Billable | | Bennett, Joshua | | | 1.100 | 425.00 | 467.50 |
| | | | | Attention to response to motion to dismiss | | | | | | |
| 02-07-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 0.600 | 800.00 | 480.00 |
| | | | | Telephone conference with D. Massey and R. Couhig; telephone conference with M. Stammell | | | | | | |
| 02-09-2018 | Approved | | Billable | | Carter, Edgar Leon | | | 1.300 | 800.00 | 1,040.00 |
| | | | | Review motion for final approval | | | | | | |
| 02-12-2018 | Approved | | Billable | | Arnett II, Bob | | | 0.300 | 650.00 | 195.00 |
| | | | | Confer with L. Levick regarding class action proof of claim; exchange email with J. Lemann regarding class action proof of claim | | | | | | |
| 02-15-2018 | Approved | | Billable | | Arnett II, Bob | | | 4.800 | 650.00 | 3,120.00 |
| | | | | Conduct legal research regarding class action proofs of claims; prepare proof of claim; prepare email to J. Lemann and D. Massey with draft proof of claim; prepare motion to apply class action procedures to proof of claim | | | | | | |
| 02-16-2018 | Approved | | Billable | | Bennett, Joshua | | | 1.400 | 425.00 | 595.00 |
| | | | | Revise response to Motion to Dismiss by Ba boa | | | | | | |
| 02-16-2018 | Approved | | Billable | | Arnett II, Bob | | | 4.300 | 650.00 | 2,795.00 |
| | | | | Review email from J. Lemann with attached spreadsheet; prepare motion to apply class action procedures to proof of claim; analyze spreadsheet of class members against mailing list for claim bar date order | | | | | | |
| 02-19-2018 | Approved | | Billable | | Arnett II, Bob | | | 2.400 | 650.00 | 1,560.00 |
| | | | | Work on proof of claim; revise motion for class treatment of proof of claim; prepare email to D. Massey, J. Lemann, and J. Pastorek with spreadsheet and motion | | | | | | |
| 02-20-2018 | Approved | | Billable | | Arnett II, Bob | | | 0.100 | 650.00 | 65.00 |
| | | | | Review email from J. Lemann regarding motion for class treatment | | | | | | |
| 02-22-2018 | Approved | | Billable | | Arnett II, Bob | | | 1.700 | 650.00 | 1,105.00 |
| | | | | Review revised spreadsheet; analyze revised spreadsheet against certificate of mailing bar date order; review email and spreadsheet from J. Lemann with dollar amounts | | | | | | |
| 02-23-2018 | Approved | | Billable | | Arnett II, Bob | | | 1.400 | 650.00 | 910.00 |
| | | | | Analyze spreadsheet with dollar amounts; prepare attachment to proof of claim; exchange email with J. Lemann regarding dollar amounts | | | | | | |
| Matter Total | | | | | | | | 153.400 | | 99,320.00 |
| Client Total | | | | | | | | 153.400 | | 99,320.00 |

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Time Entries**Carter Scholer PLLC**

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Status = Approved
 View = Original
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Task | Professional | Start | Stop | Duration | Rate | Amount |
|--------------------|--------|----------|--------------|------|--------------|-------|------|----------------|------|------------------|
| Grand Total | | | | | | | | 153.400 | | 99,320.00 |

Expense Entries

Carter Scholer PLLC

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Expense Code = All
 View = Original
 Approval Status = All
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Expense | Professional | Price | Mark Up % | Qty | Amount |
|---|----------|----------|--------------|---------------------|------------------------|--------|-----------|------|--------|
| <u>Melby, Kumar, Bhagia and Patel, et al.</u> | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | |
| 01-17-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 400.00 | 0.00 | 1.00 | 400.00 |
| E112 - Court fees: Filing Fee Complaint (Melby) | | | | | | | | | |
| 01-18-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 25.00 | 0.00 | 1.00 | 25.00 |
| E112 - Court fees:Pastorek Application for PHV (Melby) | | | | | | | | | |
| 01-18-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 25.00 | 0.00 | 1.00 | 25.00 |
| E112 - Court fees:Massey Application for PHV (Melby) | | | | | | | | | |
| 01-19-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 25.00 | 0.00 | 1.00 | 25.00 |
| E112 - Court fees:Couhig Application for PHV (Melby) | | | | | | | | | |
| 01-19-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 25.00 | 0.00 | 1.00 | 25.00 |
| E112 - Court fees:Lemann Application for PHV (Melby) | | | | | | | | | |
| 01-24-2017 | Approved | | Billable | E135 - Service Fees | Hicks McCullum, Sandra | 260.00 | 0.00 | 1.00 | 260.00 |
| E135 - Service of subpoena duces tecum on 4 Defendants (Melby) | | | | | | | | | |
| 01-31-2017 | Approved | | Billable | E108 - Postage | Hicks McCullum, Sandra | 1.78 | 0.00 | 1.00 | 1.78 |
| E108 - Postage: 01-18-17 Judge's copy of complaint to Lindsay (Melby) | | | | | | | | | |
| 02-28-2017 | Approved | | Billable | E108 - Postage | Hicks McCullum, Sandra | 6.95 | 0.00 | 1.00 | 6.95 |
| E108 - Postage: 02-17-17 TRO and Appendix to Judge Lindsay (Melby) | | | | | | | | | |
| 03-17-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 25.00 | 0.00 | 1.00 | 25.00 |
| E112 - Court fees: Pastorek Application for PHV (Kumar) | | | | | | | | | |

Expense Entries

Carter Scholer PLLC

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Expense Code = All
 View = Original
 Approval Status = All
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Expense | Professional | Price | Mark Up % | Qty | Amount |
|--|----------|----------|--------------|-------------------|------------------------|--------|-----------|------|-----------------|
| <u>Melby, Kumar, Bhagia and Patel, et al.</u> | | | | | | | | | |
| <u>MELB01-0002 MHT Class Action</u> | | | | | | | | | |
| 03-17-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 25.00 | 0.00 | 1.00 | 25.00 |
| E112 - Court fees: Massey Application for PHV (Kumar) | | | | | | | | | |
| 03-21-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 400.00 | 0.00 | 1.00 | 400.00 |
| E112 - Court fees: Filing Fee Complaint (Kumar) | | | | | | | | | |
| 03-30-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 400.00 | 0.00 | 1.00 | 400.00 |
| E112 - Court fees: Filing fee (Bhagia) | | | | | | | | | |
| 03-31-2017 | Approved | | Billable | E108 - Postage | Hicks McCullum, Sandra | 2.24 | 0.00 | 1.00 | 2.24 |
| E108 - Postage 03-14-17 Judge's copy of complaint to Lindsay (Kumar) | | | | | | | | | |
| 04-05-2017 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 400.00 | 0.00 | 1.00 | 400.00 |
| E112 - Court fees:Filing Fees (Patel) | | | | | | | | | |
| 04-28-2017 | Approved | | Billable | E108 - Postage | Hicks McCullum, Sandra | 3.50 | 0.00 | 1.00 | 3.50 |
| E108 - Postage: 04-07-17 Copy of complaint to Judge Fitzwater (Patel) | | | | | | | | | |
| 01-22-2018 | Approved | | Billable | E112 - Court fees | Hicks McCullum, Sandra | 181.00 | 0.00 | 1.00 | 181.00 |
| E112 - Court fees: Filing fees for Motion for Relief from Automatic Stay | | | | | | | | | |
| 01-31-2018 | Approved | | Billable | E108 - Postage | Hicks McCullum, Sandra | 0.46 | 0.00 | 3.00 | 1.38 |
| E108 - Postage: 01-19-18 Notice of appearance to parties | | | | | | | | | |
| 01-31-2018 | Approved | | Billable | E108 - Postage | Hicks McCullum, Sandra | 0.88 | 0.00 | 4.00 | 3.52 |
| E108 - Postage: 01-19-18 Motion for relief to parties | | | | | | | | | |
| Matter Total | | | | | | | | | 2,210.37 |

Expense Entries**Carter Scholer PLLC**

Professional = All (Active Only)
 Group By Staff Category
 Client - Matter = MELB01-0002 MHT Class Action (Active Only)
 Task Code = All
 Expense Code = All
 View = Original
 Approval Status = All
 From 01-01-2015 To 02-26-2018

| Date | Status | Approval | BillableType | Expense | Professional | Price | Mark Up % | Qty | Amount |
|------|--------|----------|--------------|---------|--------------|-------|-----------|-----|--------|
|------|--------|----------|--------------|---------|--------------|-------|-----------|-----|--------|

Melby, Kumar, Bhagia and Patel, et al.

Client Total 2,210.37

Grand Total 2,210.37